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LAHONTAN PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

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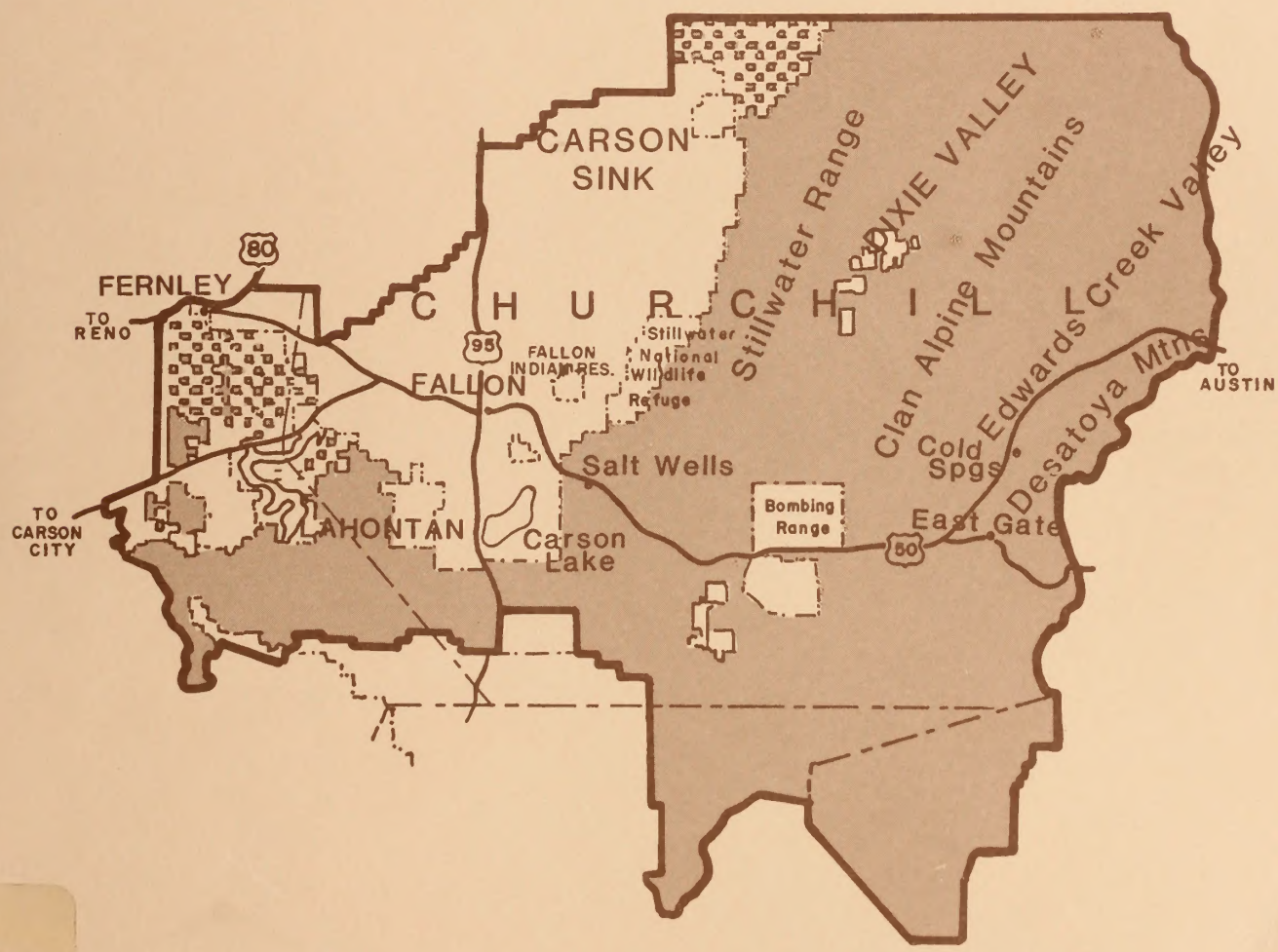

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UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
CARSON CITY DISTRICT

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PROPOSED RESOURCE MANAGEMENT PLAN

AND FINAL ENVIRONMENTAL IMPACT STATEMENT

for the

LAHONTAN RESOURCE AREA

NEVADA

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Prepared by the

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
CARSON CITY DISTRICT

Edward F. Spang
Nevada State Director

The proposed resource management plan is a long-range plan to manage 2.4 million acres of public land within the Lahontan Resource Area. The plan has been prepared in response to Sections 202 and 603 of the Federal Land Policy and Management Act of 1976 that require the Bureau of Land Management to develop land use plans for public lands and to study the suitability of certain lands for wilderness designation. An integral environmental impact statement assesses the environmental consequences of the plan.

This document is both the proposed resource management plan and the final environmental impact statement. The final resource management plan will be approved by the State Director and published in a record of decision following public review of this document. Wilderness recommendations in the plan are preliminary and subject to change during administrative review. A separate legislative final environmental impact statement for wilderness has been prepared as required by the Bureau's Wilderness Study Policy.

For further information contact: Thomas J. Owen, District Manager, Bureau of Land Management, 1050 E. William, Suite 335, Carson City, Nevada 89701 (702-882-1631).

Date this final statement was made available to the Environmental Protection Agency and to the Public: NOV 8 1984

SUMMARY

SUMMARY

Introduction

The Bureau of Land Management is proposing to implement a Resource Management Plan (RMP) for the Lahontan Resource Area of the Carson City District, Nevada.

The Lahontan Resource Area consists of four planning units: Pyramid, Long Valley, Fort Churchill, and Clan Alpine. Land use decisions for the Pyramid and Long Valley units were analyzed as part of the Reno Management Framework Plan and Grazing EIS. Those decisions will be incorporated into the Lahontan RMP by reference. For the purposes of this document, the Lahontan RMP Area will consist of the Fort Churchill and Clan Alpine units.

The area has about 2.4 million acres of public lands. Most of these lands are located in Churchill County. Smaller portions are located in Lyon, Mineral, Nye, and Storey counties (Planning Area Map).

Five alternatives were prepared for the RMP. A preferred resource management plan and four alternatives examine different solutions to five resource management issues. The preferred alternative has been selected as the Proposed Resource Management Plan.

Planning Issues

The following resource management issues are addressed in the alternatives.

1. Rangeland Management. This issue is concerned with the use of rangeland resources by livestock, wild horses, and wildlife.

2. Wilderness. This issue is concerned with the amount of acreage to be recommended suitable or nonsuitable for wilderness designation.

3. Lands. This issue is concerned with the amount of acreage to be transferred from federal ownership.

4. Rights-of-Way Corridors. This issue is concerned with the designation of rights-of-way corridors through the RMP area.

5. Soda Lake. This issue is concerned with the potential designation of Soda Lake as an Area of Critical Environmental Concern.

Alternatives

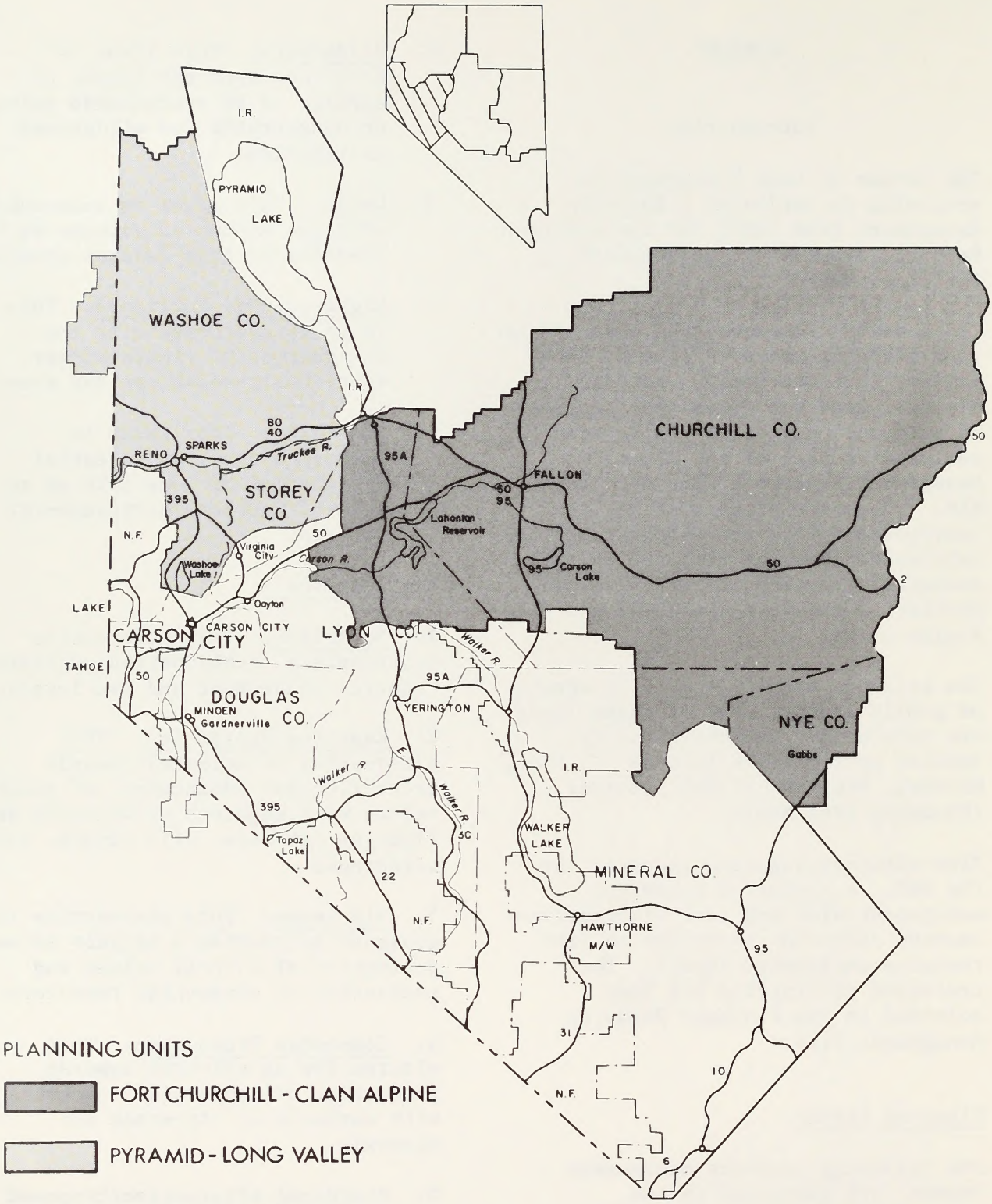
1. No Action. This alternative represents a continuation of present resource management and use levels.

2. Resource Protection. This alternative is oriented towards protection and enhancement of natural values with emphasis on wildlife and riparian habitats, wild horses, and wilderness.

3. Mid-Range. This alternative is designed to provide a balance between protection of natural values and production of commercial resources.

4. Commodity Production. This alternative is oriented towards production of commercial resources with emphasis on livestock and minerals.

5. Preferred Alternative/Proposed Resource Management Plan. This alternative, like the Mid-Range, emphasizes a balance between resource uses. It reflects changes from the Mid-Range due to further analysis and public input in the scoping and environmental analysis processes.



CARSON CITY DISTRICT

Lahontan Resource Management Planning Area

Comparative summaries of the major management actions and environmental consequences of each alternative are displayed in Summary Tables 1 and 2 respectively.

Summary Table I
LAHONTAN RMP ALTERNATIVES
SUMMARY OF SHORT TERM MANAGEMENT ACTIONS

Issues	No Action	Resource Protection	Mid-Range	Commodity Production	Preferred Alternative/Plan Proposed Resource Management
1. Rangeland Management					
a. Livestock	Continue existing uses (64,239 AUMs).	Reduce livestock grazing to 46,696 AUMs (27% reduction). Defer spring grazing. Implement Allotment Management Plans on Category I allotments. Monitor and adjust use as findings indicate.	Continue grazing at the 3-year average licensed use (64,239 AUMs). Implement AMPs on Category I Allotments. Monitor and adjust use as findings indicate.	Increase livestock use to 81,840 AUMs (27% increase). Implement AMPs on Category I Allotments. Monitor and adjust use as findings indicate.	Continue grazing at the 3-year averaged licensed use (64,239 AUMs). Implement AMPs on Category I allotments. Monitor and adjust use as findings indicate.
b. Wild Horses	Manage for existing population level of 2190 head.	Allow for an increase in horse population to 2610 head (19% increase).	Manage for the existing level of 2190 head. Monitor and adjust use as findings indicate.	Reduce horse numbers to 666 head (70% decrease).	Manage for the existing level of 2190 head. Monitor and adjust use as findings indicate.
c. Wildlife	Manage for existing populations of big game (1662 AUMs).	Manage habitat for reasonable numbers of wildlife (3201 AUMs). Emphasize increased protection of 53 miles of streams.	Initially manage for existing numbers with reasonable numbers (3201 AUMs) as an objective. Offer increased protection to 30 miles of streams.	Manage for existing populations of big game. Provide protection to 17 miles of streams.	Initially manage for existing numbers with reasonable numbers (3201 AUMs) as an objective. Provide increased protection for 30 miles of streams.
2. Wilderness	Recommend no areas for wilderness designation (0%).	Recommend 432,257 acres in four areas for wilderness designation (100%).	Recommend 268,874 acres in four areas for wilderness designation (62%).	Recommend 114,478 acres in three areas for wilderness designation (26%).	Recommend 111,511 acres in two areas for wilderness designation (26%).
3. Lands	Continue existing management (case-by-case).	Dispose of 2100 acres.	Dispose of 116,500 acres.	Dispose of 116,500 acres.	Dispose of 116,500 acres.

Issues	No Action	Resource Protection	Mid-Range	Commodity Production	Preferred Alternative/Plan Proposed Resource Management
4. Corridors	Designate no corridors.	Designate 235 miles of corridors.	Designate 361 miles of corridors.	Designate 580 miles of corridors.	Designate 361 miles of corridors.
5. Soda Lake	Continue existing management.	Designate as an ACEC, withdraw from mineral entry and acquire adjacent lands.	Designate as an ACEC.	Do not designate as an ACEC. Support nomination for the National Register of Historic Places.	Designate as an ACEC and acquire adjacent lands.
Range Improvement Implementation Cost	N/A	$438,575	$459,075	$517,975	$459,075

SUMMARY TABLE 2
LAHONTAN RMP
COMPARATIVE REVIEW OF THE ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES 1/

Environmental Component	Alternative: No Action		Resource Protection		Mid-Range		Commodity Production		Preferred Alternative/Proposed Resource Management Plan	
Soils										
Number of identified specific problem areas in which erosion problems would be reduced (%) 2/	0	(0%)	6	(86%)	4	(57%)	2	(29%)	4	(57%)
Vegetation										
Percent change in ecological condition 3/	-1%		+2%		+2%		+3%		+2%	
Wildlife										
Mule deer population (% change) 3/	518	(0%)	930	(+79%)	930	(+79%)	930	(+79%)	930	(+79%)
Wild Horses										
Short term population (% change) 3/	2,190	(0%)	2,610	(+19%)	2,190	(0%)	666	(-70%)	2,190	(0%)
Recreation										
Change in visitor days (%) 3/	4,465	(+11%)	9,299	(+23%)	7,525	(+18%)	5,009	(+12%)	6,008	(+15%)
Livestock Grazing										
Projected livestock use (AUMs)(%change) 3/	63,861	(-1%)	47,382	(-26%)	62,605	(-3%)	77,708	(+21%)	62,605	(-3%)
Geology, Energy, and Minerals										
Acres with energy and/or metallic mineral potential withdrawn 4/	0		-393,900		-229,300		-89,100		-72,100	
Forest Products										
Potential annual fuelwood harvest foregone (cords)(%) 5/	0		-434	(-35%)	-306	(-25%)	113	(-9%)	148	(-12%)
Wilderness										
Acres protected (%) 6/	0		432,257	(100%)	268,874	(62%)	114,478	(26%)	111,511	(26%)
Lands										
Acres disposed (%) 7/	N/A		2,100	(1%)	116,500	(5%)	116,500	(5%)	116,500	(5%)
Social and Economic Conditions										
Change in regional income (%) 8/	$+6,500	(1%)	$-554,000	(1%)	$-19,000	(1%)	$+444,000	(1%)	$-25,000	(1%)

1/ All impacts are long term (20 years) unless otherwise noted.
2/ Percent of identified soil erosion problem areas.
3/ Change from current situation.
4/ Acres within areas proposed for wilderness designation with moderate to high favorability for energy or metallic minerals. Percentages cannot be calculated due to lack of data.
5/ Percent of potential harvest levels. None of the alternatives would affect the current harvest level.
6/ Percent of acres within the Wilderness Study Areas.
7/ Percent of total public land acres in the RMP area.
8/ Percent of current total Churchill County income.

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CHAPTER ONE

THE PLANNING PROCESS

CHAPTER ONE

THE PLANNING PROCESS

This document is intended to be used in conjunction with the Draft and Draft Supplement Lahontan Resource Management Plan and Environmental Impact Statement (RMP/EIS). This document presents the proposed resource management plan; public comment on the draft and draft supplement RMP/EIS; Bureau responses to these comments; and revisions, errata, and additions to the draft and draft supplement RMP/EIS. Since the changes are minimal, the entire documents were not reprinted in this document pursuant to Council of Environmental Quality Regulation (40 CFR 1503.4 (b)).

Purpose and Need

The purpose of this document is to present a proposed resource management plan. It is prepared pursuant to Section 202 of the Federal Land Policy and Management Act of 1976 (FLPMA) which requires that the Secretary of the Interior shall, with public involvement, develop land use plans which provide for the use of public lands. The National Environmental Policy Act of 1969 (NEPA) requires federal agencies to prepare statements documenting the environmental consequences of federal actions significantly affecting the human environment. Since resource management plans qualify as significant actions, the preparation of an environmental impact statement is required.

The Lahontan Resource Management Plan is designed to provide a framework for future management of the public lands in the Lahontan Resource Area.

The Lahontan Resource Area consists of four planning units: Pyramid, Long Valley, Fort Churchill, and Clan Alpine. Land use decisions for the Pyramid and Long Valley units were analyzed as part of the Reno Management Framework Plan and Grazing EIS. Those decisions will be incorporated into the Lahontan RMP by reference.

For the purposes of this document, the Lahontan RMP Area will consist of the Fort Churchill and Clan Alpine units.

The RMP area has about 2.4 million acres of public lands. Most of these lands are located in Churchill County. Smaller portions are located in Lyon, Mineral, Nye, and Storey counties (Planning Area Map).

The RMP is not a final implementation decision on actions which require further specific plans such as Allotment Management Plans (AMPs), or further process steps or decisions under specific provisions of law and regulations such as designation of wilderness areas. It is prepared with an interdisciplinary approach designed, "to achieve integrated consideration of physical, biological, economic and other sciences" (FLPMA, Sec. 202(c) (2)).

In addition to meeting the planning needs for the Lahontan Resource Area, the RMP also fulfills other specific objectives. It is designed to meet the requirements resulting from settlement of a 1973 suit filed in federal court by Natural Resources Defense Council et al, concerning the adequacy of BLM's programmatic grazing EIS. The RMP also includes evaluation of four Wilderness Study Areas (WSAs) as required by Section 603 of FLPMA.

In accordance with BLM policy, the following procedure has been used in addressing environmental concerns pertaining to wilderness designation. Environmental impacts of wilderness designation have been incorporated into the Bureau planning process through the draft RMP stage. This draft document presented the impacts

to wilderness and other resources by alternative in summary form. Comments received on wilderness from the draft document will be presented in a Preliminary Final Lahontan Wilderness EIS to be published as a separate document from this final RMP. The final wilderness EIS will be submitted through the BLM Director and Secretary of the Interior to the President. The recommendations contained in the final wilderness EIS will be preliminary because they are subject to change during administrative review. Specific information is incorporated into the Lahontan Wilderness Technical Report which is available on request for those who desire more information.

Planning Process Overview

The resource management planning process is described in detail in BLM planning regulations (43 CFR part 1600). It consists of the nine planning steps outlined below.

Step 1. Identification of Issues
This step is intended to identify resource management problems or conflicts that can be resolved through the planning process.

Step 2. Development of Planning Criteria
During this step preliminary decisions are made regarding the kinds of information needed to clarify the issues, the kinds of alternatives to be developed, and the factors to be considered in evaluating alternatives and selecting a preferred resource management plan.

Step 3. Inventory Data and Information Collection
This step involves the collection of various kinds of issue-related resource, environmental, social, economic, or institutional data needed for completion of the process.

Step 4 Analysis of the Management Situation
This step calls for a deliberate assessment of the current situation. It includes a description of current BLM management, a discussion of existing problems and opportunities for solving them, and a consolidation of existing data that is needed to analyze and resolve the identified issues.

Step 5. Formulation of Alternatives
During this step several complete, reasonable resource management alternatives are prepared; including one for no action, and several that strive to resolve the issues while placing emphasis either on environmental protection or resource production.

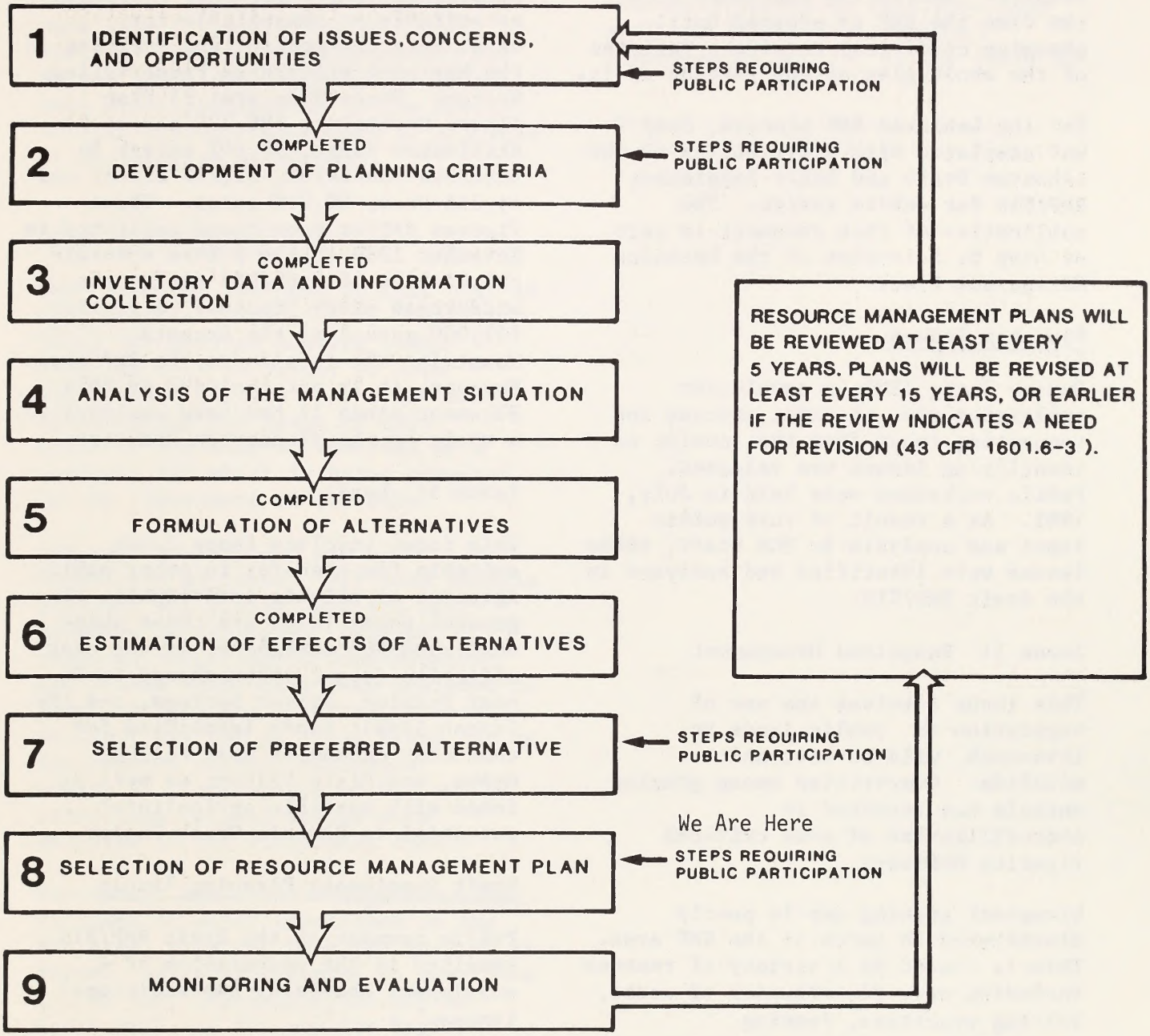
Step 6. Estimation of Effects of Alternatives
The physical, biological, economic, and social effects of implementing each alternative are estimated in order to allow for a comparative evaluation of impacts.

Step 7. Selection of the Preferred Alternative
Based on the information generated during Step 6, the District Manager identifies a preferred alternative. The draft RMP/EIS document is then prepared and distributed for public review.

Step 8. Selection of the Resource Management Plan
Based on the results of public review and comment, the District Manager will select a proposed resource management plan and publish it along with a final EIS. A final decision is made after a thirty-day appeal period on the final EIS.

Step 9. Monitoring and Evaluation
This step involves the collection and analysis of long-term resource condition and trend data to determine the effectiveness of the plan in

STEPS IN THE RESOURCE MANAGEMENT PLANNING PROCESS



resolving the identified issues; and to assure that implementation of the plan is achieving the desired results. Monitoring continues from the time the RMP is adopted until changing conditions require a revision of the whole plan or any portion of it.

For the Lahontan RMP process, Step 7 was completed with distribution of the Lahontan Draft and Draft Supplement RMP/EIS for public review. The publication of this document is part of Step 8, Selection of the Resource Management Plan.

Planning Issues

During June, 1981, a newsletter explaining the planning process and requesting input from the public on identifying issues was released. Public workshops were held in July, 1981. As a result of this public input and analysis by BLM staff, three issues were identified and analyzed in the draft RMP/EIS.

Issue 1: Rangeland Management

This issue involves the use of vegetation on public lands by livestock, wild horses, and wildlife. Competition among grazing animals has resulted in overutilization of some critical riparian habitats.

Livestock grazing use is poorly distributed in parts of the RMP area. This is caused by a variety of reasons including poor distribution of water, salting practices, fencing, topography, and livestock management. Livestock drift between allotments contributes to distribution problems as well as animal husbandry and administrative problems. In parts of the RMP area, grazing during the critical spring growth season has resulted in some deterioration of key species.

Issue 2: Wilderness

This issue involves the amount of acreage in four WSAs to be recommended as suitable or nonsuitable for wilderness designation and included in the National Wilderness Preservation System. These WSAs are: 1) Clan Alpine Mountains, 196,128 acres; 2) Stillwater Range, 94,607 acres; 3) Desatoya Mountains, 51,262 acres; and 4) Job Peak, 90,209 acres. These figures differ from those published in November 1980 due to a more accurate calculation of each WSA during the wilderness study process. A portion (51,000 acres) of the Augusta Mountains WSA is also in the RMP area. However, it is not included in this document since it has been analyzed as a whole by the Winnemucca District.

Issue 3: Lands

This issue involves those lands suitable for transfer to other public agencies or private individuals. In general these lands are those where continued BLM management is not cost effective (e.g.; checkerboard lands near Fernley, Silver Springs, and the Carson Sink); lands identified for community expansion near Fallon, Gabbs, and Dixie Valley; as well as lands with possible agricultural potential in Edwards Creek Valley.

Draft Supplement Planning Issues

Public comment on the draft RMP/EIS resulted in the preparation of a supplement analyzing two additional issues.

Issue 4: Rights-of-Way Corridors

This issue considers whether or not to designate rights-of-way corridors. Utility companies have identified the need for corridors through the Lahontan RMP Area. The designation of corridors should enable more efficient planning of future energy, communication, and transportation facilities.

Issue 5: Soda Lake

This issue involves the analysis of Soda Lake for status as an Area of Critical Environmental Concern. The Bureau acquired management of Soda Lake after publication of the draft RMP/EIS through revocation of a Bureau of Reclamation withdrawal.

Other Planning Factors

One issue not included in this plan is the potential expansion of the Fallon Naval Air Station bombing range. Although this is likely to have significant effects on the RMP area, it is beyond the scope of this document and will be analyzed in a separate EIS which is being prepared by the Department of the Navy.

Off-road vehicle use was not considered an issue. Off-road vehicle problems are minimal and are not expected to increase. Current problems occurring at Sand Mountain and Grimes Point have been analyzed in previous planning efforts. Proposals to limit ORV use at these areas can be implemented without additional analysis. The impacts of ORV use on wilderness related values were analyzed in the wilderness issue.

Geothermal and other energy resources, although of major importance to the RMP area, have not been included as an issue. Existing planning as specified in the Fort Churchill/Clan Alpine Geothermal and Oil and Gas Regional Environmental Assessments (EAs) has been determined to be adequate for future land use in the RMP area. These EAs identify areas open for competitive and noncompetitive leasing, areas closed to leasing, and areas subject to surface occupancy. They also identify stipulations necessary to minimize adverse environmental impacts. These EAs are available for review at the Carson City District Office. Although not an issue, impacts to the development of these resources from management actions proposed in this plan were analyzed in the Environmental Consequences section of the draft RMP.

CHAPTER TWO

THE PROPOSED RESOURCE MANAGEMENT PLAN

CHAPTER TWO

THE PROPOSED RESOURCE MANAGEMENT PLAN

The proposed resource management plan emphasizes a balanced approach to land management in the Lahontan RMP Area. It is the result of a detailed analytical process which began in July 1981 with the Issue Identification phase. Public involvement has been stressed throughout the process.

The plan provides for protection and enhancement of the natural environment while not overly restricting the production of commercial resources from the public lands. It is essentially the same as the preferred alternative in the draft and draft supplement RMP with only minor wording changes to clarify proposed management actions and implementation procedures.

The following sections outline those management actions and procedures for the five issues covered in this document: Rangeland Management, Wilderness, Lands, Rights-of-Way Corridors, and Soda Lake.

RANGELAND MANAGEMENT

Objectives

Improve the condition of the public rangelands so as to improve productivity for all rangeland values.

Initially, manage livestock use at existing levels.

Initially, manage for wild horses and their habitat in current herd use areas at present population levels.

Initially, manage habitat for existing numbers of big game, while recognizing reasonable numbers as a management goal.

Maintain and improve wildlife habitat, including riparian/stream habitat, and reduce habitat conflicts while providing for other appropriate resource uses.

Short-Term Management Actions (0-5 years)

1. Initially, authorize livestock use at the three-year average use level of 64,239 AUMs. There would be no initial decisions to adjust active preference.

2. Develop AMPs/grazing systems on Category I allotments and grazing systems as needed on Category M and C allotments to improve condition, provide for proper utilization within key areas, achieve better livestock distribution to obtain more uniform utilization, and provide an increase in available forage and water for livestock, wild horses, and wildlife.

The range improvements to support the above management actions would include:

a. The development of water facilities and systems which would include: 1) drilling three wells, 2) laying two miles of water pipeline, 3) installing one windmill, 4) four water storage tanks, 5) 16 water troughs, and 6) two spring source developments.
b. Construction of 70 miles of fence and installation of nine cattle guards.
c. Treatment of vegetation through spraying 1960 acres of brushland and old seedings, and developing 1000 acres of new seedings.

3. Adjust allotment boundaries in the Dead Horse Well, LaBeau Flat, and Phillips Well allotments to provide for improved grazing management.

4. Continue existing rangeland monitoring studies, and establish new studies as recommended by the 1981 Nevada Range Monitoring Procedures to determine if management objectives are

being reached and what adjustments in livestock use, wildife reasonable numbers, and wild horse numbers are necessary.

When reasonable numbers of mule deer are attained, these numbers may be adjusted based on joint monitoring studies by NDOW and BLM.

5. Conduct wild horse gatherings as necessary to initially maintain the herds at the current population of 2190 head.

6. Approximately four waters would be developed to benefit wild horses and their habitat, consistent with other uses.

7. Manage wildlife habitat initially to provide 1,662 AUMs for existing big game (mule deer and bighorn sheep).

8. Continue implementation of the Job Peak, Desert Mountain, and Sand Springs/Fairview Peak HMPs.

9. Support reintroductions of bighorn sheep into historic habitat areas in the Stillwater, Clan Alpine, and Desatoya Mountains by NDOW.

10. Support reintroductions of Lahontan cutthroat trout and other sensitive fish species into streams and springs identified as potential habitat by NDOW.

11. Develop range improvements to protect and improve mule deer, sage grouse, bighorn sheep, fisheries and riparian habitat; and to improve livestock and wild horse distribution and vegetation utilization. This would include 30 miles along eight streams and 1600 acres of meadows at Cherry Valley. Approximately 40 developed spring sources and 25 of the undeveloped spring sources would be protected. Seven wildlife guzzlers would also be installed.

Long Term Management Actions (6-20 years)

1. In the long term, the range monitoring program would provide data on which to base future adjustments in livestock, wildlife reasonable numbers, and wild horse use and to identify additional range improvements. All future adjustments and improvements would be designed to achieve the objectives of this alternative.

2. The initial assignment of allotments into the categories of "Maintain", "Improve", and "Custodial" would be evaluated periodically. These evaluations would assure that the management objectives are being reached and that AMPs and range improvements would be initiated for those allotments requiring more intensive management.

3. Providing forage for reasonable numbers (3201 AUMs) of big game would be a long term objective.

It is anticipated that additional habitat management plans will be prepared and implemented in the long term.

WILDERNESS

Objectives

Wilderness designation is recommended for those study areas where wilderness values are capable of balancing other resource values and uses which would be foregone due to wilderness designation. Whether or not an area can be effectively managed as wilderness over the long term has also been considered.

Acreage with high quality wilderness characteristics and no major resource conflicts, major manageability problems, or significant combination of lesser conflicts or problems will

be included in areas recommended as suitable. (See Wilderness map).

Management Actions

1. Clan Alpine Mountains: A portion (68,458 acres) of this unit is recommended suitable. Wilderness values are high, the area can be managed as wilderness over the long term, and the great majority of resource conflicts have been eliminated.

2. Stillwater Range: This entire unit is recommended nonsuitable. Wilderness values are not of sufficient quality to warrant designation. Major resource conflicts and manageability problems exist. The Geology, Energy, and Mineral (GEM) report evaluation finds it to be one of the best "... potential areas for future metallic mineral finds of all the WSAs studied in the Basin and Range province...".

3. Desatoya Mountains: A portion of this unit (43,053) is recommended suitable. Wilderness values are high and outweigh the relatively minor resource conflicts which remain. Fifty-one acres were added to the WSA to enhance manageability of the area. Further field analysis resulted in a boundary adjustment in response to the Governor's Consistency Review.

4. Job Peak: This entire unit is recommended nonsuitable. Wilderness values are moderate to good in portions of the WSA, however, they are not sufficiently high to either outweigh resource conflicts and manageability problems or warrant designation.

WSA NAME	SUITABLE ACRES	NONSUITABLE ACRES
Clan Alpine Mountains	68,458	127,670
Stillwater Range	0	94,607
Desatoya Mountains (Includes Area Contigous with Desatoyas)	43,053	8,260
Job Peak	0	90,209
TOTAL	111,511 (26%)	320,746 (74%)

LANDS

Objective

To transfer out of federal ownership those lands identified as suitable or potentially suitable for disposal (Lands Disposal Map).

Management Actions

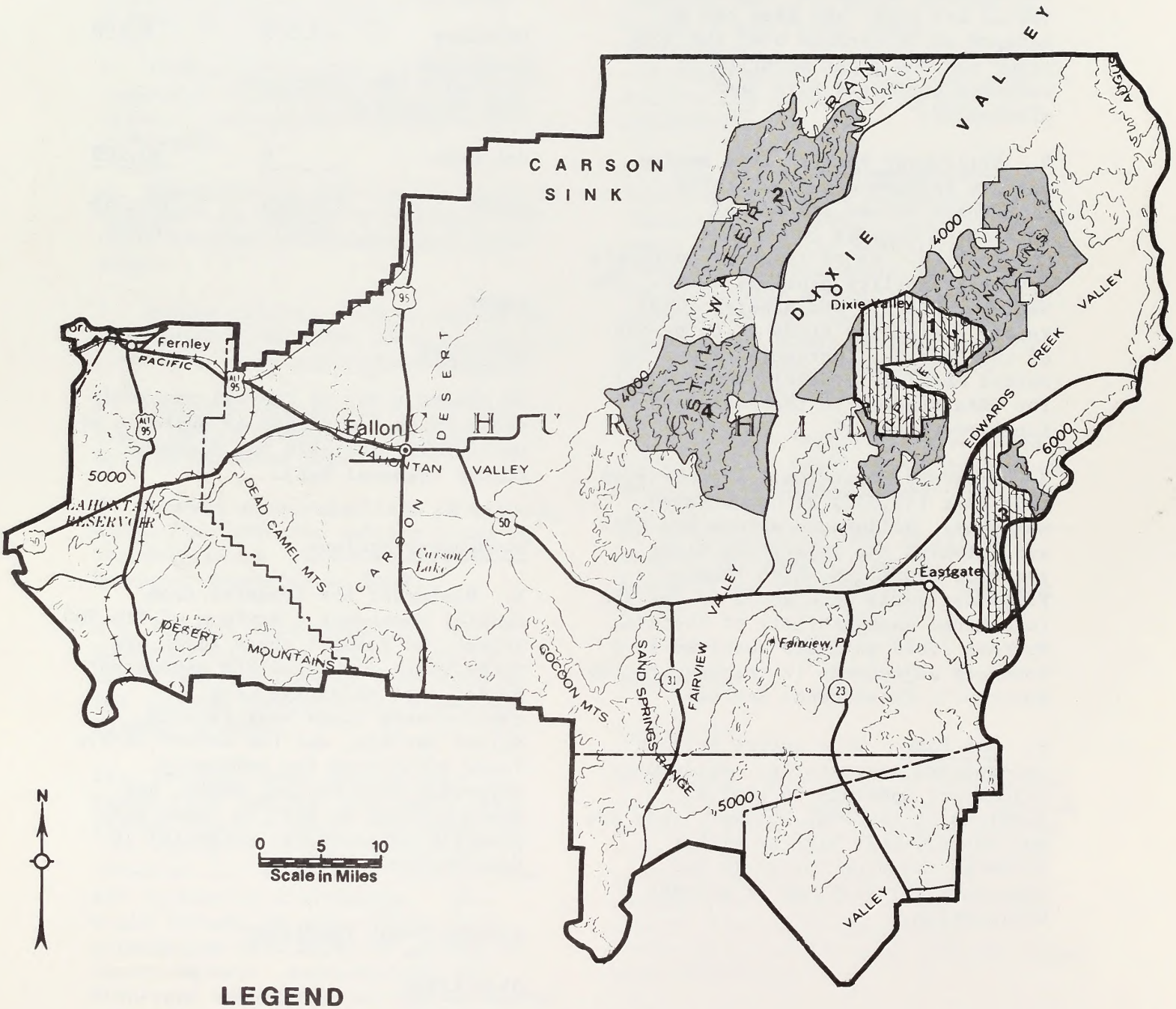
1. Designate for transfer from federal ownership a maximum of 116,500 acres. In general these lands are those where continued BLM management is not cost effective (e.g.; checkerboard lands near Fernley, Silver Springs, and the Carson Sink); lands identified for community expansion near Fallon, Gabbs, and Dixie Valley; as well as lands with possible agricultural potential in Edwards Creek Valley.

RIGHTS-OF-WAY CORRIDORS

Objectives

To provide utility companies with specific area designations within which they could establish an east-west and north-south network of rights-of-ways.

1. CLAN ALPINE RANGE NV-030-102
2. STILL WATER RANGE NV-030-104
3. DESATOYA MOUNTAINS NV-030-110
4. JOB PEAK NV-030-127



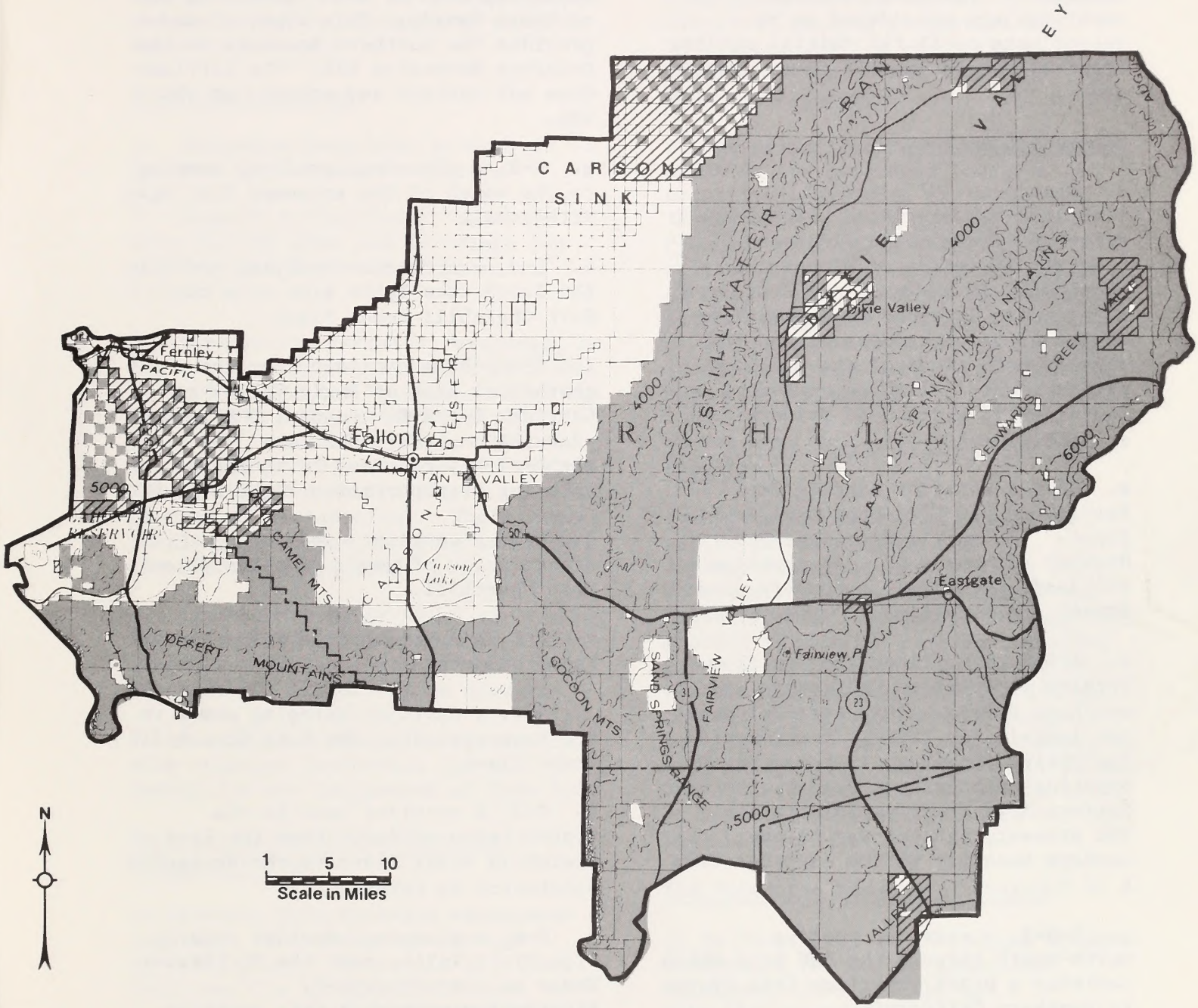
LEGEND

RECOMMENDED NONSUITABLE

RECOMMENDED SUITABLE

WILDERNESS
PROPOSED ACTION

PUBLIC LANDS DESIGNATED AS SUITABLE FOR DISPOSAL



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

CARSON CITY DISTRICT

LAHONTAN RESOURCE MANAGEMENT PLAN AREA

LAND—DISPOSAL

To concentrate adverse impacts to the environment by locating compatible rights-of-way in designated corridors. Planning corridor locations are considered to be approximate until the initial utility right-of-way is located in or around them.

Management Actions

1. Designate 187 miles of rights-of-way corridors which include existing transmission lines and identify 174 miles of planning corridors, as shown on the Preferred Alternative Corridor map. Existing rights-of-way corridors extend one mile on both sides of the existing right-of-way. Planning corridors are two miles in width. No private land is included.

a. A-J, a corridor running from Fernley to the Fort Churchill Power Plant. The corridor follows U.S. Highway Alternate 95. It contains a railroad, phoneline, secondary power lines, and pipelines.

b. A-B-G, a corridor running from Fernley to southern California and southern Nevada. This corridor does not contain any utility transmission facilities, however, it contains an existing right-of-way held by the Western Area Power Administration. The present right-of-way is the eastern boundary of the corridor from B to G.

c. A-B-I, a corridor running north-south through the RMP area which contains a major powerline from Oregon to southern California.

d. W-S-G, a planning corridor, running south from corridor I-F-R-E.

e. Q-E, a planning corridor, running from Dixie Valley toward Austin. This corridor passes north of the Clan Alpine Mountains and south of the Augusta Mountain WSAs.

f. I-F-R-E, a corridor running from the Fort Churchill Power Plant to Utah. It contains a major powerline supplying much of the electricity for northern Nevada. This right-of-way provides the northern boundary of the Desatoya Mountains WSA. The corridor does not include any portion of the WSA.

g. S-R, a planning corridor, running to the south of the proposed U.S. Navy Withdrawal.

h. L-J, a corridor supplying power to the South Lake Tahoe area from the Fort Churchill Power Plant.

i. P-Q-D-F, a corridor from the geothermal area of Dixie Valley to Corridor I-F-R-E. Segment Q-D is a planning corridor, D-E is a right-of-way corridor following an existing transportation right-of-way.

j. N-O, a corridor used for transmission of power from Tracy to Fort Churchill.

k. C-B, a corridor from Valmy to the Lahontan Substation.

l. M-J, a corridor bringing power to the Reno area from the Fort Churchill Power Plant.

m. Z-J, a corridor used in the transmission of power from the Fort Churchill Power Plant to the Brunswick Substation in Carson City.

n. D-W, a planning corridor running from Dixie Valley over the Stillwater Range to corridor W-S-G. Rights-of-way through this corridor would be approved only if and when the Job Peak WSA is dropped from further consideration as wilderness.

SODA LAKE

Objective

Provide a high level of protection for Soda Lake, while recognizing other resource values.

Management Actions

1. Designate Soda Lake an Area of Critical Environmental Concern.

2. Support nomination of the Soda Lake factory site and buildings for the National Register of Historic Places.

3. Acquire via transfer, exchange, or fee title purchase, all land in T 19 N, R 28 E, Section 7, exclusive of the N½NW¼ (TCID & Churchill County); Section 8, exclusive of the E½E½ and NW¼ or NE¼ (TCID); Section 18, NE¼ of NE¼ (TCID); and Secion 17, N½ of NW¼ (Bureau of Reclamation). These lands, totaling 619 acres, will be added to the ACEC when acquired.

4. Implement a minor level of facility development including signs, underwater markers, trails and other recreational facilities as needed.

5. Establish cooperative agreements with adjacent landowners for the protection and management of Soda Lake.

Implementation of the Resource Management Plan

In general, this resource management plan will be implemented through activity plans. These are detailed, site-specific management actions outlined in livestock AMPs, wildlife HMPs, wild horse HMAPs, and wilderness management plans among others. These plans will be multiple-use in nature. They will include actions such as range improvements and grazing systems. Monitoring will be used to ensure that plans meet their objectives.

Rangeland Program Summary

A Rangeland Program Summary will be issued within five months of the completion date of the RMP to inform livestock grazing permittees and interested publics about the implementation of the rangeland management program.

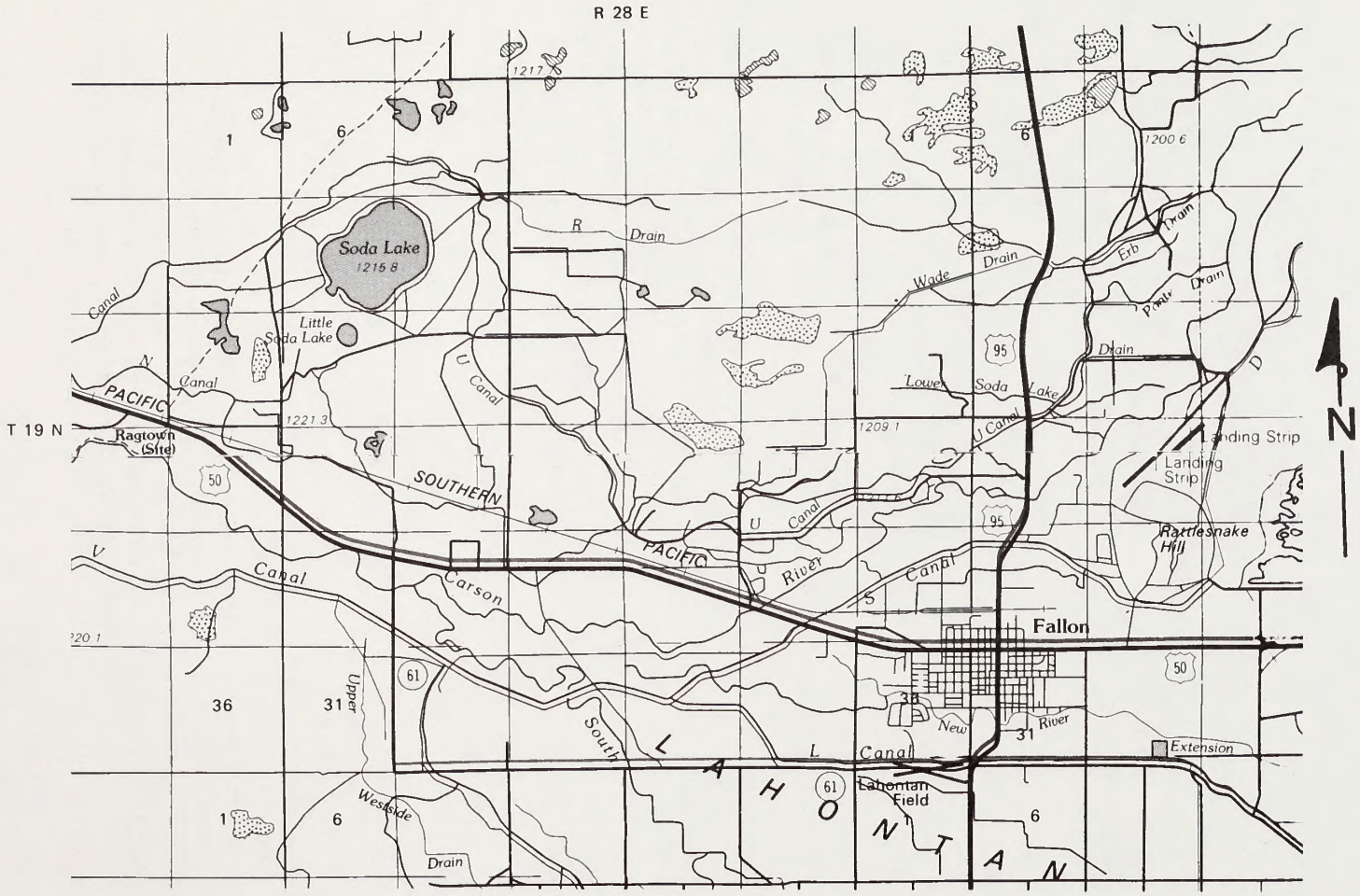
The Rangeland Program Summary (RPS) explains the procedure involved in establishing initial and subsequent levels of livestock grazing use. Proposed grazing decisions and agreements will be announced as part of the RPS, and will include either initial livestock grazing use levels or identify the data needed and the procedures to be used in determining future adjustments.

Coordinated Resource Management and Planning

The preferred method of achieving public involvement in the implementation of this plan is the Coordinated Resource Management and Planning (CRMP) process. Through this process interested parties including livestock operators, representatives of interest groups, local, state and federal officials, and the general public will be given an opportunity to work together to resolve conflicts and strengthen management of public lands by developing recommendations for the implementation of this plan.

The Selective Management Policy

It is the policy of the Bureau of Land Management to address rangeland management problems through a selective management approach. This approach assigns management priorities among allotments within a planning area. This is based on identifying allotments with similar management needs, resource characteristics, and potential for improvement in both resource and economic returns. The similarity among the allotments allows



SODA LAKE AND VICINITY

LAHONTAN RMP AREA

BUREAU OF LAND MANAGEMENT
CARSON CITY DISTRICT OFFICE
CARSON CITY, NEVADA

them to be grouped into three categories with each having its own objective. The three categories and their objectives are: Maintain current satisfactory condition; Improve current unsatisfactory condition; or manage the allotments Custodially, while protecting existing resources.

The use of these allotment categories will help to establish priorities for distributing available funds and personnel in such a way as to achieve cost-effective improvement of rangeland production and condition. These resources will be used to develop grazing systems and install range improvements in order to resolve grazing related problems. These priorities identify those allotments where more intensive management is needed.

Allotments have been placed in the (M) Maintenance, (I) Improvement, and (C) Custodial categories using the criteria outlined in Appendix B of the Lahontan Draft RMP/EIS.

Allotment Management Plans

Allotment management plans would be developed for all Category I allotments, and Category M and C allotments as needed. These plans would be multiple-use in nature and coordinated with wildlife and wild horse plans. Key components of AMPs are monitoring studies, grazing systems, range improvements, and evaluations.

Grazing Treatments and Systems

Grazing treatments are the building blocks of AMPs or grazing systems and are designed to improve rangeland condition by manipulating livestock grazing to accomplish objectives of management. A grazing treatment describes the level of grazing use and periods-of-use for a unit (usually a pasture) of an allotment, or an entire allotment in one or more years. The deferrment of grazing, or complete rest from grazing during the critical growth period of key management species, would allow these species to maintain and/or increase their density, composition, vigor, production, and reproduction. The following treatments (singly or in various combinations) would be implemented to form grazing sytems in AMPs for specific allotments in Category I within the Lahontan RMP Area.

Treatment 1: Rest from livestock grazing for one or two growing seasons. Complete rest during the growing season allows key management species to improve vigor, increase litter accumulation, seed production, seedling establishment, and allows seedlings to develop adequate root growth to withstand appreciable grazing and trampling.

Treatment 2: Livestock grazing from midsummer to fall (approximately July 16 to November 15 -- dates vary with allotment). Grazing after seed-ripe would provide better seed dispersal and trampling. When coupled with other treatments that provide for spring rest the following year, this treatment would allow an improvement in seedling establishment for key grass species and many shrubs.

Treatment 3: Following seedings which are implemented as a result of wildlife prescribed burns, or herbicidal spraying, rest these areas from livestock grazing for two years. This treatment provides protection until seedlings are established and grazing would not be detrimental to the project.

Treatment 4: Defer livestock grazing from early spring to midsummer (approximately April 1 to June 30). This treatment could be required yearly. Pastures could be rested during the spring in alternate years,

or in accordance with some other schedule. Improved vigor and reproduction of key management species would result.

Where intensive grazing management systems are implemented, proper utilization levels may be exceeded during each grazing cycle. The periodic rest from grazing would allow the key management species to increase in vigor and production.

Range Improvements

Range improvements needed to implement grazing systems include fencing, water developments, and vegetation treatments.

Wildlife Habitat Management Plans

Wildlife habitat improvement projects would be guided by habitat management plans. These plans would be developed through consultation with interested parties and would be coordinated with livestock, wild horse, and wilderness plans. These plans would be focused on stabilization and improvement of wildlife habitat through water developments, grazing management, vegetation treatments, and monitoring studies.

Riparian protection measures would involve implementation and evaluation of grazing management systems and techniques which have been designed to enhance riparian habitat before initiating extensive fencing of specific areas to exclude wild horses and livestock. These measures would involve consultation and coordination with affected livestock permittees and other interested parties.

Wild Horse Herd Management Area Plans

Wild horse management would be guided by HMAPs. These plans would be developed through consultation with interested parties and would be coordinated with livestock and wildlife plans. They would be focused on wild horse management through determination of proper horse use levels, development of water sources, and population and habitat monitoring studies.

Vegetation Monitoring

Future adjustments in livestock, wild horses, and wildlife reasonable numbers will be based on consultation with interested parties and an analysis of data from monitoring studies. This involves the use of vegetation study techniques to measure vegetation condition and trend, grazing utilization and distribution, actual use information, and climatic data. Appendix F of the draft RMP contains a discussion of the manner in which ecological condition relates to management goals.

Category I allotments have the greatest number of resource conflicts and potential for improvement. Therefore, more intensive monitoring efforts including frequency transects (1981 Nevada Range Monitoring Procedures), key forage plant utilization, weight estimate condition, actual use, and precipitation studies will be implemented or continued in these allotments to determine whether planning objectives are being met with proposed management and treatments. Management and/or grazing use levels may be changed based upon the results of these studies.

Few changes in management or treatments are anticipated for Category M and C allotments. Therefore, less intensive monitoring efforts, including utilization, actual use, precipitation, and perhaps a few frequency studies within key areas will be implemented or continued to determine whether current conditions are being maintained, and existing resources protected with present management.

Wilderness

All wilderness study areas would continue to be managed under BLM's Interim Management Policy until completion of the wilderness review process. Wilderness recommendations made in the final wilderness environmental impact statement are subject to change during administrative review. A separate final wilderness EIS will be prepared and filed by the Secretary of the Interior. A wilderness technical report describing each WSA in detail provides additional information in support of these documents. Following review of these documents, detailed mineral surveys will be conducted by the U.S. Geological Survey and Bureau of Mines for each area recommended as preliminarily suitable for wilderness designation. After review of this data, those areas determined to be suitable would be recommended to Congress for designation. Those areas determined to be nonsuitable would be recommended to Congress for elimination from wilderness consideration.

Designated wilderness areas would be closed to off-road vehicle use unless it takes place as part of a valid existing right or is authorized in the wilderness management plan. Separate management plans tailored to the characteristics of each area would be developed through consultation with interested parties. They would be coordinated with other activity plans for their areas. Specific management objectives, requirements, and decisions implementing administrative practices and visitor activities would be developed in each plan. Designated wilderness areas would be segregated against appropriation and operations under the mining laws, mineral leasing laws, and other mineral disposal authorities subject to valid existing rights. Designation would allow for continuation of livestock grazing permits.

Lands

All lands disposal actions proposed are discretionary. Bureau initiatives for disposals, other than through exchange, would only be in those areas identified for disposal. Proposed land tenure adjustments would be evaluated through the environmental analysis process to determine if the action would be consistent with the objectives of the plan. These adjustments would be coordinated with interested parties, including local governments. Beneficial exchanges and non-bureau initiated realty proposals would be considered throughout the RMP area. These proposals could include sales, agricultural entry, Recreation and Public Purposes Act requests, easements, permits, leases, or rights-of-way.

Rights-of-Way Corridors

The designation of rights-of-way corridors is intended to minimize the proliferation of dispersed rights-of-way by indicating the Bureau's preferred location. Designation does not mean that future rights-of-way are restricted to corridors, nor is it a committment by the Bureau to approve all rights-of-way applications within corridors - a corridor is not a withdrawal.

Corridor management involves encouraging prospective applicants to locate within corridors. This may limit other activities within corridors which are not compatible with right-of-way use. Land disposals within corridors will be analyzed for their impact on future right-of-way activities.

All applications for right-of-way grants, whether or not they are within designated corridors, are subject to standard approval procedures as outlined in the right-of-way regulations (43 CFR 2802). These

procedures include: 1) Preparation of an environmental analysis in accordance with the National Environmental Policy Act of 1969; 2) A determination of compliance of the applicant's proposed plan with applicable federal and state laws; 3) Consultation with federal, state, and local agencies; 4) Any other action necessary to fully evaluate and make a decision to approve or deny the application and prescribe suitable terms and conditions for the grant or permit. Consultation and coordination with the public, including adjacent landowners will occur throughout the process.

Corridors provide for a variety of right-of-way uses including powerlines, pipelines, railroads and highways. The major use expected in the RMP area is powerlines.

Future rights-of-way located in corridors crossing U.S. Navy withdrawals would be subject to review by the Navy. Powerlines over 50 feet in height are of particular concern.

Soda Lake

Designation of Soda Lake as an Area of Critical Environmental Concern (ACEC) does not by itself preclude any activities allowed under the public land laws. The ACEC designation is a recognition of the special resources of an area and a commitment to provide management which protects and/or enhances the area. No action that is inconsistent with the terms of an ACEC designation or that would adversely impact an ACEC protected resource will be permitted, unless it is found through the plan amendment process that the public benefits of such an action outweigh the public benefits of continuing the ACEC protection and that there is no feasible alternative to the proposed inconsistent action. Protection of the ACEC is accomplished through management actions developed specifically for each individual area.

Listing this area on the National Register of Historic Places requires consultation with the President's Advisory Council on Historic Preservation prior to initiating any action affecting the area.

Plan Monitoring

Monitoring will include not only the vegetation monitoring described above, but also monitoring of the RMP itself. At intervals not to exceed five years, the management actions will be analyzed for consistency with plans adopted by local, state, and other federal agencies and Indian tribes, and new data will be analyzed to determine its significance to the plan.

Support Requirements

Support requirements such as cadastral survey, engineering design, additional inventories, etc., will be determined during the activity planning phase of this RMP when more specific proposals are available.

STANDARD OPERATING PROCEDURES

Certain requirements are inherent in the implementation of any Bureau action on the public lands. These requirements, or standard operating procedures, are designed to mitigate impacts and would be followed during supervision and construction of range improvements necessary for implementation of alternatives, including the proposed action.

1) An environmental review (i.e., environmental assessment) will be prepared before projects are developed except when they are covered by a categorical exclusion so that, depending on impact, implementation, modification, or abandonment of the project may be considered.

2) Cultural resource protection requires compliance with Section 106

of the National Historic Preservation Act of 1966, and Section 101(B)(4) of NEPA of 1969. Prior to project approval, intensive (Class III) field inventories will be conducted in specific areas that would be impacted by implementing activites. If cultural or paleontological sites are found, every effort will be made to avoid adverse impacts. However, where that is not possible, the BLM will consult with the State Historic Preservation Officer.

3) Any project which has a visual contrast rating that exceeds the recommended maximum for the visual class zone in which it is proposed, the visual contrasts are considered significant and mitigating measures must be examined. The ultimate decision in these cases of whether a particular project's visual impact is positive or negative, acceptable or unacceptable, and whether mitigating measures must be implemented, rests with the District Manager and must be made on a project-by-project basis.

4) Air quality will be protected as all Bureau and Bureau-authorized activities must be designed to prevent air quality deterioration beyond the established standards specified in the Nevada Ambient Air Quality Standards. The Federal Land Policy and Management Act of 1976 specified the protection of air and atmospheric quality on BLM lands in Sec. 102(a)(8), and compliance with state and federal laws in Sec 202(c)(8). The Federal Land Policy and Management Act also requires an active role in preventing air quality violations on BLM lands in Sec. 102(c)(8). The Clean Air Act of 1977 has specific requirements for the federal land managers to protect the air over land under their jurisdiction.

5) Public Law 92-195, December 15, 1971, "Wild Horse and Burro Protection Act", Sec. 4 requires that wild horses or burros that stray from public lands onto privately owned land be removed upon request from the landowners.

6) Benefit Cost (B/C) analysis will be performed on improvements required to implement new AMPs and other activity plans subsequent to the EIS. Such improvements will be analyzed on an allotment basis. The B/C analysis will be performed in compliance with Bureau policy.

7) Permanent roads would not be constructed into project sites. Existing access, off-road travel, or temporary roads which would be rehabilitated after construction activity would be used.

8) Construction of all fences would conform with the objectives and specifications in Bureau Manual 1737 to assure minimization of impacts to wildlife, wild horses, recreation, and visual resources.

9) Fences in wild horse herd use areas would be located to minimize interference with the normal distribution and movement of wild horses. Selected portions of new fences constructed in these areas would be flagged or otherwise marked for one year after construction to make them more visible.

10) The clearing of vegetation from project sites would be restricted to the minimum amount necessary.

11) Application of herbicides, such as 2, 4-D, on proposed treatment areas to reduce sagebrush and other plant species would be in accordance with procedures established in Bureau Manual 9222 to ensure nonimpairment of other than target species.

12) All disturbed areas would be rehabilitated, where such action is necessary and practical, to replace ground cover and prevent erosion.

13) Maintenance of structural improvements shall be provided by the user deriving the primary benefit from the improvement through cooperative agreements and as specified in the Bureau's 1982 Rangeland Improvement Policy.

14) Lands would not leave federal ownership if the required mineral report concludes that the mineral potential of the land is of greater than nominal value.

15) Land not identified as suitable for disposal would be retained in public ownership. The determination of suitability would include an analysis of Threatened and Endangered Species, wetlands, riparian areas, flood plains, and wildlife, livestock, and wild horse values.

16) All public land within the RMP area will be designated for control of ORVs. All lands not specifically designated closed or limited to ORVs will be open to such use.

17) Rights-of-way for public access would be reserved prior to disposal of lands.

18) None of the lands identified as suitable for disposal would be transferred to other ownership if a cultural resources survey shows that they contain sites determined to be eligible for inclusion in the National Register of Historic Places.

19) Livestock permits would be adjusted, if necessary, to reflect decreases in public land acreage available for livestock grazing use within an allotment as a result of land disposal.

20) Fire management plans would be developed before any prescribed burning occurs.

21) Each wilderness study area will be managed in accordance with Section 603(c) of FLPMA and the Interim Management Policy and Guidelines for Lands Under Wilderness Review (1979) in order to preserve its wilderness characteristics until Congress either designates it as wilderness and includes it in the National Wilderness Preservation System, or officially releases it from further wilderness consideration. After designation as wilderness by Congress, each wilderness area will be managed in accordance with the Wilderness Management Policy (1981) and the wilderness management plan developed for the individual area.

22) Lands released by Congress from further wilderness consideration will be managed in the same manner as similar lands in the Preferred Alternative.

23) A Threatened or Endangered species clearance for plants or animals would be required before any part of the plan were implemented that would affect a Threatened or Endangered Species or its habitat. If any part of the plan would impact a threatened or endangered species or its habitat, the impacts of the project would be mitigated, or the project abandoned if appropriate measures were not feasible.

24) Water would be made available in allotments and rested pastures for wild horses and wildlife, wherever feasible.

25) Spring improvement projects would be fenced and water would be piped away from the source to a trough or pond if necessary. Water would also be left at the spring source.

26) Where the need is identified for wildlife use, water improvements would include bird ramps in watering troughs, lateral water sites off pipelines, overflows at troughs, protected seep areas, and fences around spring developments.

27) Alteration of sagebrush areas either through application of herbicides, prescribed burning, or by mechanical means would be in accordance with the Memorandum of Understanding between the Nevada Department of Wildlife and Bureau of Land Management. These procedures specify among other things, that vegetation control measures would be prohibited on sage grouse breeding complexes, wintering grounds, or within 100 yards of a stream or meadow.

28) Livestock grazing would be deferred for at least two growing seasons on all vegetation manipulation projects, including prescribed burns, to allow vegetation to be established.

29) Mineral resource survey reports will be prepared by the U.S. Geological Survey and the U.S. Bureau of Mines on all areas with a preliminary recommendation as suitable for wilderness designation. The mineral resource reports will become part of the information used for the final recommendations on wilderness suitability.

30) After December 31, 1983, lands designated as wilderness will be withdrawn from all forms of appropriation under the mining laws and from disposition under all laws pertaining to mineral leasing unless Congress specifically provides otherwise.

31) Reasonable access will be allowed for all valid rights established prior to wilderness designation.

32) Operations on valid mining claims located in a designated wilderness will be authorized pursuant to 43 CFR 3809 and subject to the provisions of the Wilderness Act.

33) Plans of Operation and Applications for Permit to Drill on oil and gas and geothermal leases within a designated wilderness area will be reviewed in accordance with NEPA, subject to the provisions of the Wilderness Act.

34) During the pre-construction and construction periods, the Bureau will make modifications to any right-of-way necessary to maintain stability of geologic materials, fish and wildlife habitats, the environment, and the public interest.

35) The Bureau will, if necessary, suspend any construction or maintenance activity of a right-of-way grantee if there is an immediate threat to life (including wildlife and aquatic life), property, or the environment.

36) A right-of-way grantee shall abate any conditions existing that could potentially cause irreparable harm or damage to any person or property.

37) Existing roads and trails will be used whenever possible during right-of-way construction.

38) The right-of-way grantee shall permit free and unrestricted public access to and upon the right-of-way for all lawful and proper purposes, except in areas designated as restricted by Grantee with the consent of the Bureau in order to protect the public safety or facilities constructed on the right-of-way.

39) The Bureau must approve the location of all rights-of-way prior to construction by an analysis of the proposed action through an environmental assessment, cultural resources clearance, Threatened and Endangered Species evaluation, and a visual resource management evaluation.

40) The right-of-way Grantee will use every reasonable means to minimize erosion and soil damage in connection

with any construction, rehabilitation, or maintenance operations under a grant, including (but not limited to) construction of water bars, cross ditches, or other structures.

41) Grantee shall remove or dispose of all waste in accordance with a plan approved by the Authorized Officer and in a manner consistent with federal, state and local laws and regulations.

42) Revegetation of disturbed lands will be required in areas as identified by the Bureau. The appropriate seed mixture and proper planting techniques will be specified by the Bureau.

43) The right-of-way grantee's activities in connection with the project system in key fish and wildlife areas will, when necessary, be restricted by the Bureau during periods of fish and wildlife breeding, nesting, spawning, lambing or calving activity; and during major migrations of fish and wildlife.

44) All operations under right-of-way grants will be conducted in such a manner as will avoid: a. Permanent blockage of any drainage system; b. Changing the character, or causing the pollution or siltation of rivers, streams, reservoirs, ponds, water holes, or springs; and c. Damaging fish and wildlife resources and habitat.

45) The right-of-way grantee will take such measures as are necessary to assure unrestricted passage and movement of fish and wildlife. No artificial structure or stream channel alteration that would cause a blockage to the movement of fish will be allowed.

46) Right-of-way grantee shall construct, maintain, operate and/or modify structures or facilities as directed by the Bureau to protect and minimize adverse effects upon raptors and other wildlife. Raptors will be protected through the use of "Suggested Practices for Raptor Protection on Powerlines", Raptor Research Report No. 4, Raptor Research Foundation, Inc. (1981). Holder shall report any and all wildlife kills, including raptor electrocutions, discovered or reported on or near project facilities to the Bureau.

47) A complete intensive cultural resources survey (BLM Class III) must be completed and documented by the Bureau, or if the Bureau deems necessary, qualified archaeologists engaged by the right-of-way applicant prior to issuance of a grant. Known or located cultural sites would be avoided within the corridors when locating roads and towers.

48) Grantee will immediately bring to the attention of the Authorized Officer all antiquities or other objects of historic or scientific interest, including but not limited to historic or prehistoric ruins, fossils, or artifacts discovered as a result of operations under this grant and will leave such discoveries intact.

49) Materials and colors used in tower construction will visually blend with the surrounding landscape to meet the approval of the Bureau. Only non-reflective materials will be used for towers, lines, and insulators.

50) All mining operations, other than casual use, occuring within an ACEC are approved through a Plan of Operation, filed pursuant to 43 CFR 3809 so as to prevent unnecessary and undue degradation.

CHAPTER THREE

REVISIONS, ADDITIONS AND ERRATA

CHAPTER THREE

REVISIONS, ADDITIONS, AND ERRATA

This section contains revisions and additions to the text of the Lahontan Draft and Draft Supplement RMP/EIS. It also contains errata of sections not reprinted in this final.

Paragraphs referred to in the draft and draft supplement RMP/EIS are numbered consecutively, beginning with the first paragraph of each page.

Chapter 2 Draft RMP/EIS

The section on Implementation of the Resource Management Plan, page 2-13 now includes the statement: "This section applies to all alternatives except No Action."

Chapter 3: Draft RMP/EIS

The second sentence of the third paragraph on page 3-1 is changed to read "Sediment Yield averages 1.1 tons/acre/year (Appendix C)".

Table 3-2 on page 3-6 of the draft is changed to show the livestock period-of-use for Phillips Well allotment as 12/15-4/15.

The last sentence of the first paragraph on page 3-16 is changed to read: "Total average ORV use for the Lahontan RMP area is about 23,000 visits per year (Appendix H)".

The second sentence in paragraph seven of page 3-21 is changed to read: "These difficulties include: vehicular access and ORV use; possible concentrated trailhead use; ways and cherrystem roads which extend into the heart of the area; configuration problems due to peninsula-like, non-WSA intrusions; boundary adjustments which rely heavily on legal descriptions; maintenance of a Fallon NAS radar site; supersonic operating area proposals; and potential energy and mineral exploration."

The fifth sentence of the fourth paragraph on page 3-22 is changed to read: "A naval radar site and implementation of a Supersonic Operating Area may present management difficulties in the future."

Paragraph five of page 3-23 is revised to include: "One exception is the naval radar site just east of Job Peak itself. Routine maintenance of this site by helicopter so close to the main feature of the WSA could have a negative impact on solitude and recreation opportunities for a short period of time, during which maintenance is taking place."

Paragraph seven on page 3-23 is revised to include: "Maintenance of a naval radar site at the extreme northwest corner of the WSA should not cause any significant manageability problems."

Chapter 4: Draft RMP/EIS

The following reference is added to each of the listed paragraphs/sentences: "(USDI, BLM, Great Basin GEM Report, 1983)", add to paragraph 12, page 4-17 first sentence; paragraph ten, first sentence, page 4-31; paragraph one, first sentence, page 4-32; paragraph ten, third sentence, page 4-44; and paragraph seven, first sentence, page 4-52.

The following sentence is added to each paragraph listed: "There would be a potential reduction in income due to reduced demand for lodging, fuel, food, and supplies for exploration and drilling crews. This cannot be quantified due to lack of data."; add to paragraph five, page 4-22; paragraph four, page 4-36; and paragraph six of page 4-48.

The third paragraph, line 3 under Stillwater Range page 4-18 is changed

to read: "...26,900 acres designated as having high favorability".

First paragraph, page 4-32, the acreage figure is changed from 3,600 acres to 7,600 acres.

The third paragraph, last sentence on page 4-43 is deleted. The following sentence is inserted in its place: "Mitigation of sites on lands for sale would salvage the artifacts, but the site would be lost for study in the future. Cultural resources are non-renewable, every site dismantled is lost forever."

The last sentence in paragraph four of page 4-43 is changed to read: "This is not expected to result in a loss of cultural resources due to the mitigation measures as outlined in Standard Operating Procedure No. 2 on page 2-16."

The first sentence of the first paragraph under Geology, Energy, and Minerals of page 4-52 is changed to read: "...constrained activities on 29 mining claims, 26,400 acres under oil and gas lease, and no acres under geothermal lease; and the withdrawal of 76,100 acres of lands designated as having moderate favorability for the occurrence of metallic minerals and geothermal resources."

Chapter 4: Draft Supplement RMP/EIS

Paragraph two under Wildlife on pages 4-2, 4-5, 4-8, 4-11, and 4-14 is changed to read: "Construction and/or establishment of maintenance or access roads could open up more areas for hunting."

The third paragraph under Wildlife on page 4-14 is changed to read: ...This could be an impact to bighorn sheep populations. This corridor also follows close to or across the boundary of the Stillwater National Wildlife Refuge. Some mortality would be expected to occur to waterfowl that could fly into the lines (USFWS, 1984). This is expected to be minor since the corridor is one mile east of the major waterfowl concentrations.

Appendices

Paragraph two of page 7-15 is revised as follows: Criteria two is changed to "Level of Utilization"; Criteria four is changed to "Use Distribution". The following sentence is inserted between the second and third sentences: "It should be noted that criteria one, two, and four consider grazing use by livestock, wild horses, and wildlife."

On page 7-27 the Desatoya Mid-Range acreage should be 7,600 for Moderate favorability for metallic and geothermal.

Errata

Corrections were made to the following tables which have been reprinted:

Table 3-5, correct spelling of Erigonum.

Table 3-8, correct identified problem No. 4 for Cow Canyon, not Copper Kettle.

Table 3-9, correct number of existing Rights-of-Way and applications.

Appendix B, Table 1, correct criteria C for Clan Alpine, Dixie Valley, Edwards Creek, and Hole-in-the-Wall allotments.

TABLE 3-5

POTENTIAL THREATENED AND ENDANGERED PLANT SPECIES
LAHONTAN RESOURCE AREA

	Species (Taxa)	Status[1/]	Category[2/]
Ca ne	Camissonia nevadensis	OR	2
Er le	Eriogonum lemmoni	OR	1
Op pu	Opuntia pulchella	W	3C
Or ne	Oryctes nevadensis	T	2
As ps	Astragalus pseudiodanthus	OR	2
As le se	Astragalus lentiginosus var. sesquimetralis	T (Nev.)	1
Ph gl	Phacelia glaberrima	W	1

1/ Nevada Native Plant Society Designation:

OR - other rare (not considered under threat)

W - Watch (unknown abundance and distribution, threat not defined)

T - Threatened (species likely to become an endangered species within the foreseeable future throughout all or a portion of its range.)

T (Nev.) - Threatened (listed by State of Nevada NRS 527.270)

2/ U.S. Fish and Wildlife Service listing:

1 - Taxa currently under review, data warrants consideration as Threatened or Endangered.

2 - Taxa whose rarity status is insufficiently known - needs more study

3 - Taxa no longer under review
a. definitely extinct
b. not a good taxonomic entity
c. more abundant than previously thought - no current recognizable threat.

TABLE 3-8
ALLOTMENT MANAGEMENT
PROBLEMS

ALLOTMENT	PROBLEM 1/				
	1	2	3	4	5
Adriance Valley				X	
Bass Flat					
Bell Flat					
Boyer Ranch					
Bucky O'Neill					
Churchill Butte					
Clan Alpine	X	X	X	X	X
Cleaver Peak					
Clifton Flat					
Copper Kettle	X	X			
Cow Canyon	X		X	X	X
Dead Horse Well					
Desert Mountain					
Dixie Valley		X	X	X	X
Eastgate (AMP)	X	X	X		X
Edwards Creek	X		X	X	X
Frenchman Flat					
Fort Churchill					
Hole in the Wall	X	X	X	X	X
Horse Mountain			X		
Horse Springs					
LaBeau Flat					
Lahontan			X		
Mtn. Well - La Plata (AMP)					X
Phillips Well	X				
Rock Springs					
Salt Wells					
Stockton Flat					
Truckee-Virginia					
White Cloud					
TOTAL	7	5	8	6	7

1/
1. livestock drift
2. livestock distribution
3. competition for forage with wild horses
4. improper period-of-use
5. specific areas of overutilization

Note: That portion of the New Pass unit of the Mt. Airy allotment (Battle Mtn. Dist.) within the Lahontan RMP area (4328 acres) has not been included due to lack of data. The Mt. Airy allotment was analyzed in the Shoshone-Eureka RMP prepared by the Battle Mountain District.

TABLE 3-9
WSA RESOURCES AND CHARACTERISTICS
FOR THE LAHONTAN RESOURCE AREA

	Clan Alpines	Stillwater Range	Desatoyas	Job Peak
Acres	196,128	94,607	51,262	90,209
Existing Visitor Days 1/	2,026	520	1,241	578
Special Features				
Ecological	X		X	X
Geological	X	X	X	X
Scenic	X	X	X	X
Cultural Resources 2/				
Aboriginal	X	X	X	X
Historic		X	X	
Scientific & Educational Values				
Wild Horses 3/	800-900	10-15	100-125	15-20
Other	X	X	X	X
Energy & Minerals				
Mining Claims				
Number	451	592	0	235
Acres	9,020	11,840	0	4,700
Geothermal Leases				
Number	6	15	0	16
Acres	5,800	11,000	0	15,200
Oil & Gas Leases				
Number	69	17	4	7
Acres	118,000	18,000	2,100	9,800
Woodland Products				
Harvestable Acres	10,850	0	2,240	0
Livestock Management				
Permittees 4/	3	4	3	4
AUMs	5,334	2,035	2,215	4,860
Rights-of-Way				
Existing	3	1	1	1
Application	0	0	0	0
Withdrawal Application	0	0	0	1

1/ Estimated by the Lahontan Area Outdoor Recreation Planner and Lahontan Area Wilderness Specialist.
2/ Statistical projections infeasible; indicates whether or not resource is an important feature in area.
3/ Estimated by District Wild Horse & Burro Specialist.
4/ There is a total of nine permittees utilizing the four WSAs. Some permittees graze cattle in more than one of the study areas.

Source: Bureau of Land Management, Carson City District, 1983.

APPENDIX B

TABLE 1

CRITERIA BY ALLOTMENT

ALLOTMENT	CRITERIA 1/									CATEGORY		
	A	B	C	D	E	F	G	H	I	M	I	C
Adriance Valley		X			X							X
Bass Flat			X	X				X		X		
Bell Flat					X			X		X		
Boyer Ranch			X		X			X		X		
Bucky O'Neill			X		X					X		
Churchill Butte			X		X					X		
Clan Alpine		X	X		X		X	X			X	
Cleaver Peak					X					X		
Clifton Flat					X					X		
Copper Kettle		X			X		X				X	
Cow Canyon	X	X	X		X		X	X			X	
Dead Horse Well					X							X
Desert Mountain			X	X						X		
Dixie Valley	X	X	X			X	X	X			X	
Eastgate (AMP)			X		X			X		X		
Edwards Creek		X	X		X		X	X			X	
Fort Churchill					X					X		
Frenchman Flat			X		X			X		X		
Hole-in-the-Wall		X			X		X				X	
Horse Mountain			X		X		X	X		X		
Horse Springs					X				X			X
LaBeau Flat					X		X			X		
Lahontan			X	X						X		
Mtn. Well/La Plata			X		X					X		
Phillips Well				X						X		
Rock Springs					X					X		
Salt Wells					X					X		
Stockton Flat					X				X			X
Truckee/Virginia					X				X			X
White Cloud					X					X		

A. Range condition is not satisfactory.
B. Management is not satisfactory.
C. Has potential for improved vegetation production.
D. Apparent trend is upward.
E. Apparent trend is static or there is no apparent trend.
F. Apparent trend is downward.
G. Resource conflicts are significant.
H. Potential for a positive return on investment.
I. Percent of Federal land is low and/or small.

1/ Most significant criteria only.

CHAPTER FOUR

CONSULTATION AND COORDINATION

CHAPTER FOUR

CONSULTATION AND COORDINATION

Public Involvement

A Notice of Intent to commence land use planning for the Lahontan Resource Area was published in the Federal Register in July, 1981. Three public workshops for identification of issues were held. Two in Carson City on July 27 and one in Fallon on July 28, 1981. News releases were issued to all local newspapers, and an open invitation letter was sent out to the public to attend the public meetings.

Briefings on the planning process and issue identification were given to the District Advisory Council and the Grazing Advisory Board for the Carson City District.

Bureau personnel met with the various county commissions throughout the year to inform them about the planning process, and to identify concerns of the counties regarding resource uses in their areas.

A letter explaining the results of issue identification efforts and draft planning criteria was sent to individuals and organizations in December, 1981.

Scoping

Again in May, 1983, the Carson City District went to the public for comment on proposed alternatives for the Lahontan RMP. On May 10, 1983, a news release was circulated through the local newspapers opening a 30 day comment period on alternatives. A letter was sent to every person or organization on the mailing list, which included a summary of the alternatives which had been developed. The comment period ended on June 10, 1983.

The comments received concerning the preferred resource management plan and the alternatives will be addressed in the final resource management plan.

Public Review and Hearings

A Notice of Availability of the Draft RMP and filing of the plan with the Environmental Protection Agency was published in the Federal Register in October, 1983. The notice also announced the scheduling of two public hearings on the draft, November 9, 1983 in Reno, and November 10 in Fallon. Subsequently, a third public hearing was scheduled in response to public request for December 1, 1983 in Carson City. A public comment period for written comments extended until January, 1984.

A news release was sent to all local newspapers announcing the availability of the Draft RMP and the dates for each hearing. The dates for the comment period were included in the notice released to news media on September 28, 1983.

A total of 84 persons attended the three public hearings, with 38 of these making an oral presentation. Letters of comment were received from 56 reviewers, including comment from the Governor's State Clearinghouse in Nevada.

Transcripts of the public hearings are available for inspection at the Carson City District Office at 1050 E. William Street, Suite 335, Carson City; or at the Nevada State Office, Public Affairs Office, 300 Booth Street, Reno, Nevada.

Availability of the Draft

The Draft and Draft Supplement Lahontan Resource Management Plan and Environmental Impact Statement, or a summary of the plan were sent to over 500 agencies, organizations, companies and individuals who indicated an interest. Drafts and wilderness technical reports were also available upon request from the District Office.

As a result of comments on the Draft, it was determined that two additional issues needed to be analyzed. A Draft Supplement RMP/EIS was subsequently prepared. It was released for public review in June, 1984 for a 60 day comment period. A total of 17 comment letters were received.

During the same period, the Preliminary Final RMP/EIS for the three issues analyzed in the Draft was being reviewed by the Governor's office in compliance with the consistency requirements of the planning regulations (43 CFR 1610.3-2). The Governor's response was received in August 1984.

Copies of both the Lahontan Draft RMP and Draft Supplement were sent to the following:

CONGRESSIONAL

Senator Chic Hecht
Senator Paul Laxalt
Congressman Harry Reid
Congresswoman Barbara Vucanovich

FEDERAL

Advisory Council on Historic Preservation
Department of Agriculture

Forest Service

Soil Conservation Service

Stabilization and Conservation Service
Department of Defense

Department of the Navy
Department of Energy
Department of the Interior

Bureau of Indian Affairs

Bureau of Mines

Bureau of Reclamation

Fish and Wildlife Service

Geological Survey

National Park Service
Department of Transportation
Environmental Protection Agency

STATE

Office of the Governor, Nevada
Nevada State Clearinghouse
Legislative Counsel Bureau

BUREAU OF LAND MANAGEMENT OFFICES

Office of Public Affairs
Bureau of Land Management
18th and C Streets
Washington, D.C. 20240

Nevada State Office
300 Booth Street
P.O. Box 12000
Reno, NV

Battle Mountain District Office
North 2nd and Scott Street
P.O. Box 194
Battle Mountain, Nevada

Carson City District Office
1050 E. William St., Ste. 335
Carson City, Nevada 89701

Elko District Office
2002 Idaho Street
Elko, Nevada 89801

Ely District Office
Star Route 5, Box 1
Ely, Nevada 89301

Las Vegas District Office
705 East 4th Street
Winnemucca, Nevada 89445

PUBLIC LIBRARIES

Churchill County Public Library
553 South Main Street
Fallon, Nevada 89406

Carson City Library
900 N. Roop St.
Carson City, Nevada 89701

Lyon County Library
Yerington, Nevada

Mineral County Library
1st and D Streets
Hawthorne, Nevada 89415

Nevada State Library
Library Building
Carson City, Nevada 89710

Nye County Library
Tonopah, Nevada 89049

University of Nevada, Las Vegas
James R. Dickinson Library
4505 Maryland Parkway
Las Vegas, Nevada 89154

University of Nevada, Reno
Getchall Library
Reno, Nevada 89507

Washoe County Library
1301 South Center Street
Reno, Nevada 89505

Availability of the Proposed Resource Management Plan and Final Environmental Impact Statement

This document has been mailed to all those who received copies of the Draft and/or Draft Supplement, as well as those who commented on these documents. A Federal Register Notice and news releases have been issued to inform the public of the availability of this document. A limited number of additional copies are available upon request from the Carson City District Office. Review copies are available at the listed BLM offices and Public libraries.

COMMENTS AND RESPONSES

All substantive comments from the public hearings and all comment letters have been reproduced in this document except as noted. Responses have been prepared to comments that relate to inadequacies or inaccuracies in the analysis or methodologies used, identify new significant impacts, recommend reasonable new alternatives, involve disagreements on interpretations of significance, or indicate significant misconceptions or misinterpretations of BLM programs and policies.

There are three sections to this part of the RMP. Section One displays comments and responses on the Draft RMP/EIS. Section Two displays comments and responses on the Draft Supplement RMP/EIS. Section Three displays the letter received from Governor Bryan following the State's consistency review of the Lahontan Preliminary Final RMP/EIS.

SECTION ONE

COMMENTS AND RESPONSE TO THE DRAFT RMP/EIS

Hearing Testimony

T-1 Warren Richardson
T-2 Rudy Adams
T-3,4,5 Douglas Miller
T-6,7,8,9,10,11 Ira Kent
T-12 Lynn Wodell

Letter No.	Commentor
1	Environmental Protection Agency
2	Churchill County Commissioners
3	M.C. LeFever
4	Elliott Bernshaw
5	Trans-Pacific Geothermal, Inc.
6	Reed Secord
7	Edward P. Galantowicz, Jr.1/
8	Bureau of Indian Affairs
9	Bureau of Reclamation
10	Ken Goldsmith
11	Churchill County Planning Commission
12	Nevada Outdoor Recreation Association
13	Nevada Division of State Parks
14	Brent Boyer
15	National Park Service
16	Lahontan Audubon Society, Inc.
17	Nevada Department of Minerals
18	Ecology Center of Southern California
19	Craig C. Downer
20	Nevada Division of State Lands
21	Eileen and Darwin Lambert
22	Mining Petition2/
23	Burt Koehler
24	Sierra Pacific Power Company
25	Nevada State Office of Community Services
	Department of Agriculture
	Department of Wildlife
	Department of Transportation
	Department of Conservation & Natural Resources
	Nevada Bureau of Mines and Geology
26	Ethel Thorniley
27	Sierra Club, Chair Public Lands
28	Sierra Club, Chair Conservation
29	Sierra Club, Chair Wilderness
30	Alta Exploration, Inc.
31	California Association of 4WD Clubs
32	Defenders of Wildlife
33	Thomas Murarik
34	Resource Concepts, Inc.

35	The Cleveland Museum of Natural History
36	Paul Clifford
37	Department of the Navy
38	ASARCO
39	Nevada Cattlemans Association
40	Governor Richard H. Bryan

1/ There were 17 other letters received which were similar to letter No. 7. These were not printed in this document due to prohibitive printing costs. These were from the following commentors.

Courtney Smith	Dennis Trease
Edward Diver	Cheri Conkoske
Barbara Kelley	Denise Smith
Carola P. Hutcherson	Gregory Ebner
Gayle Marrs Smith	William Kersten
Steven Thaw	Earl Kersten
Marjorie Sill	Ann Kersten
Betty Kersten	Laura Kersten King
Guy King	

2/ The petition from the Nevada Miners contained a total of 157 signatures.

Testimony	Response
Hearings Testimony	
T-1 "I'm just going to give you one example of the mineral survey that was missed in the Stillwater Range, Nevada 030104W11. I wish to call your attention to rich cobalt and nickel deposits worked in the early 1800's near the summit of the Stillwater Range and shipped clear to Wales for smelting." (p 29 - Warren Richardson)	T-1 The area in question lies outside the boundaries to the north of the Stillwater Range Wilderness Study Area.
T-2 "And even on page 46 of the report, it states over the long term loss of primitive and the unconfined types of recreation would occur because eventually if this wilderness concept is continued, they'll have everything out there . . . . . "(pg. 57 - Rudy Adams)	T-2 The reference to page 4-6 of the Draft RMP/EIS concerning the loss of primitive and unconfined types of recreation over the long term deals with the anticipated impacts should the areas not be designated as wilderness. This is expected to occur due to anticipated increases in vehicle oriented recreation and the continuation or expansion of other resource uses which could impair or destroy wilderness values in the long term.
T-3 "In the White Cloud area, White Cloud Canyon, I built a road some 15 years ago. We exported from the ridge of this area that they're wishing to make a wilderness area . . . . . That road is still in existence, and it's in the wilderness area." (p 79 - Douglas Miller)	T-3 The road up to the mouth of White Cloud Canyon has been excluded from the Wilderness Study Area. There is no road beyond the mouth of the canyon.
T-4 "There's also a tungsten property up near the peak of the - up near the backbone of this ridge, and this is a matter of record, and it should have been included as a high mineral area." (p 79 - Douglas Miller)	T-4 The tungsten property was considered and contributed to the high favorability rating given this area (Ref. Stillwater Range GEM Technical Report).

Testimony	Response
T-5 "I personally have driven this area all the way from Fondelet (Fondaway) Canyon on the west up over the ridge and down on the other side . . . . " (p 80 - Douglas Miller)	T-5 The road which crosses the Stillwater Range follows East and West Job Canyons. It is outside the boundaries of both the Stillwater and Job Peak Wilderness Study Areas. There is no road crossing the range in the vicinity of Fondaway Canyon.
T-6 "Page 3-4, Ecological Conditions. Mountain Well La Plata at 10549 acres, rated poor. I question and disagree with the rating given in two areas. A portion of one of these areas has Idaho fescue, and there are only two areas in the Job Peak area that have Idaho fescue. With these errors I note - I question how many more there are in the draft. . . ." (pg 6 - Ira Kent)	T-6 The Lahontan RMP vegetation condition inventory, which is based upon a third order SCS soils survey and associated range site correlation, indicates a limited occurrence, within the Mountain Well/La Plata allotment, of range sites which have a significant amount of Idaho fescue in the potential plant communities. Approximately 8000 acres of these sites were located and 20 percent were identified as having good ecological condition. Of the 10,549 acres rated as having poor ecological condition, over 60 percent of these acres are low potential, low production sites (Appendix E, page 7-8). None of the moderate or high potential sites which include Idaho fescue in the species composition were rated as having poor condition. Certainly, stands of Idaho fescue may occur within the Job Peak area as randomly distributed vegetation type inclusions. Some of these may not have been identified and classified due to their size, dispersed occurrence, and the nature of the third order based inventory. Such a discrepancy is a function or result of the level or extensive nature of the survey. Also, the presence or absence of a certain species will only correlate with high ecological condition rating if that species is an important part of the potential plant species composition for the site. Please refer to the glossary section of the Lahontan RMP for an additional discussion of ecological and forage condition.

Testimony	Response
	A vegetation condition inventory provides a current measure of the health and potential of the rangeland. Such information is an invaluable aid in estimating the impacts of various planning alternatives as required by court mandate, monitoring of vegetation reponses to grazing management, planning the type and location of the most beneficial and cost effective range improvements, and preparing useful allotment management plans. Range condition is a measure of the present vegetative health while the terms "static or improving" refer to vegetative trend or the direction in which vegetative condition is moving (please see page 3-5). As shown in Table 3-1, page 3-4, the Mountain Well/La Plata allotment has no apparent (static) trend at this time.
T-7 "Page 3-26. I question the accuracy of the income figures and percentages of the total for agriculture for Churchill County which is shown as six percent. In this sector, I will read from the Eagle Standard of 11/8/83, a report by the Churchill County Chamber of Commerce. 'Farm income should be of great concern to every retail merchant . . . . for two reasons: agriculture provides nearly one half of disposable income for Churchill County.' So there is a great deviation with the figures that are used in the draft environmental statement and what the actual figures are that the Churchill County Chamber of Commerce have come up with." (pg 7 - Ira Kent)	T-7 The Chamber of Commerce study was based on comparing gross agricultural sales figures that the Chamber estimated with the county wide effective buying income estimates produced by Market Statistics Inc. for Sales and Marketing Management Magazine. David Glazer of Market Statistics Inc. indicates that this is an inappropriate technique since the figures are not comparable. One is a gross income estimate while the other is a net income estimate. The estimates published in the Draft RMP/EIS were obtained from the University of Nevada, Reno, Bureau of Business and Economic Research. They are consistent since they all deal with net personal income.

Testimony	Response
T-8 "Our present management plans are grandfathered in and will they supercede the EIS? We have a three mile long pipeline to be built in East Lee Canyon which is shown in our AMP. We have been told this supercedes the proposed wilderness withdrawal. Is this correct?" (pg 8 - Ira Kent)	T-8 The Interim Management Policy and Guidelines for Lands Under Wilderness Review (IMP) allows the installation of a series or system of range improvements within a WSA if a part of that series or system had been installed before the enactment of FLPMA (October 21, 1976) under an agreement between the BLM and the grazing operator. An Allotment Management Plan between the BLM and Mr. Kent was originally signed in 1968 and amended in 1970. A portion of this plan called for the construction of three pipelines, two of which have been built. The third pipeline, two miles long and to be placed in East Lee Canyon, has not yet been constructed. Installation of this pipeline is permissible under the terms of the IMP subject to reasonable mitigation measures designed to prevent unnecessary and undue degradation of the lands.
T-9 "4-19 We helped plant fish in Horse Creek, the Dens, Shirttail Canyon, Coyote, Edwards Creek. How are you going to put cutthroat back in these native habitat when they were never there? None of the rest of the streams mentioned ever have had fish and will not sustain them." (p. 8 - Ira Kent)	T-9 The Lahontan Basin supported Lahontan Cutthroat Trout. Individual streams may have lost their populations prior to the settling of the area due to droughts and flash floods. The Nevada Department of Wildlife is conducting an inventory to determine which streams in the RMP area will sustain Lahontan Cutthroat Trout at this time. Those streams selected as potential habitat as fisheries will be supported by the BLM.

Testimony	Response
T-10 "Page 7-32. This data is very badly outdated and is very misleading to the average person." (p 8 - Ira Kent)	T-10 The table on page 7-32 is based on the most recent comprehensive data available. The data was obtained from a ranch budget survey conducted in October and November of 1982. Fifteen Lahontan area ranchers provided this data. The data was used to develop preliminary ranch budgets. These were mailed to all of the livestock permittees in the RMP area as well as the Cooperative Extension Service in Fallon in April, 1983 with a request for comments on their accuracy. The data used in the Draft RMP/EIS were the result of those comments.
T-11 "Page 75B, The Lahontan Wilderness Technical Report, no winter grazing Lahontan Valley rock which needs to be corrected. It evidently was eliminated when the technical report was being drafted." (p 9 - Ira Kent)	T-11 The Lahontan Wilderness Technical Report states that grazing in the La Plata/Mountain Well, Dixie Valley and White Cloud allotments takes place primarily in the spring, summer and fall. There is winter grazing in these allotments, however little occurs in the Job Peak WSA. In the other three seasons the entire range is being utilized, while in the winter cattle tend to congregate at the lower elevations below the WSA.
T-12 "We do not believe lands containing energy and mineral resource potential should be designated as wilderness. It is imperative that priority consideration be given to exploration in those areas which contain mineral resource potential. We think there's a major factor which must be taken into account in the determination of what type of protective management is warranted or required . . . .(p 18 - Lynn Wodell)	T-12 Prior to designation of any lands in the Lahontan Resource Area as wilderness, an intensive survey of each area's mineral resource potential will be conducted by the U.S. Geological Survey and the Bureau of Mines. Wilderness suitability recommendations could be amended or even reversed based upon the outcome of these surveys.

Comment Letter 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca 94105

January 3, 1984

Thomas J. Owen
District Manager
1050 East William Street, Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled LAHONTAN RESOURCE MANAGEMENT PLAN. We have no comments on this DEIS.

We have classified this DEIS as category LO-1 (lack of objections - adequate EIS). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send two copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy, Technical and
Resources Management

Comment Letter 2

Office of the
Churchill County Commissioners
Fallon, Nevada 89406

December 21, 1983

United States
Department of the Interior
Bureau of Land Management
Attn: Edward F. Spang, State Director
300 Booth Street
Reno, Nevada 89509

SUBJECT: Comments regarding Draft Lahontan Resource Management Plan, Draft Environmental Impact Statement and Wilderness Studies.

Dear Mr. Spang:

It appears that the Bureau of Land Management has come a long way toward recognizing the need for multiple use of public lands since 1980. At that time some 450,000 acres of public land within the Lahontan Resource area faced severe restrictions to access as a result of a decision by the BLM designating these lands for further study to determine their wilderness characteristics.

Since that time a more rational approach seems to have prevailed as evidenced by the relatively moderate, Preferred Alternatives discussed in Chapter 2 of the Draft Lahontan Resource Management Plan and Environmental Impact Statement.

After reviewing the alternatives outlined in Chapter 2 of the Draft EIS we find that the preferred alternatives as presented beginning on page 2-11 are realistic for the most part. The removal of the Stillwater Range and the Job Peak area from further wilderness consideration is heartily endorsed both from an economic point of view due to mining and grazing as well as the recognition of a lack of unique and qualifying features necessary for wilderness designation.

-1-

Comment Letter 2

2-1 We are disturbed by the recommendation to maintain the wild horse populations at their current levels. The obvious competition for rangeland by wild horses, cattle and wildlife clearly mandates action in favor of cattle production and wildlife other than horses. When one considers the destruction of springs and naturally occuring watering places by wild horses and their far ranging nature, we wonder about the advisability of the development of watering facilities without reducing the horse population. The placement of watering facilities will notably not reduce the destruction of naturally occurring watering places and the resultant loss in wildlife habitat without a concomitant reduction in wild horse populations. Just as any wild game is harvested to control population so should the wild horse be controlled.

We note that the development of water facilities includes the drilling of three wells which we assume will be done upon securing the necessary water rights and drilling permits issued by the State of Nevada Department of Water Resources.

The specific areas selected for wilderness designation in the Clan Alpine and Desatoya Mountains may have certain merit but, we caution the BLM with respect to management problems inherent with wilderness.

2-2 One of the largest potential problems we forsee is the impairment of efficient rescue operations in designated wilderness areas resulting from the ban on vehicles. While it is possible to call in a rescue helicopter from the Fallon Naval Air Station this is not always practical except in medical emergencies. Occassionally, the Sheriff's Search and Rescue unit must enter an area in order to locate a lost child or other persons. The nature of this type of rescue requires that a team, or teams, be able to access an area as rapidly as possible. This may require vehicles to transport the rescue team

-2-

Response Letter 2

2-1 The proposal is to initially maintain wild horses at the current level. Current data on vegetation production and utilization is not sufficient enough a base on which to justify adjustments in wild horse or livestock numbers. Range monitoring data is currently being collected, if this data so indicates, adjustments would be made in the future.

2-2 Section 4(c) of the Wilderness Act of 1964 provides that the prohibition of temporary roads, motor vehicles, and aircraft in a wilderness area may be temporarily suspended when an emergency arises involving the health and safety of persons in the area. The Bureau's Wilderness Management Policy expands this to include motor vehicles and equipment required for a fire suppression emergency. Also allowed are overflights by Civil Air Patrol search and rescue aircraft and the use of helicopters for evacuations. A management plan will be developed for each area designated as wilderness. These plans will include emergency procedures specifically tailored to each area. Local government officials, including the County Sheriff, as well as the Fallon Naval Air Station, will be consulted during the development of these plans.

Comment Letter 2

to the last known location of the missing person in order to prevent loss of life due to exposure and other threats. We fear that this will be one of the major drawbacks in any wilderness area, not just those in Churchill County. The cost to mount a rescue operation both in terms of time and equipment will climb dramatically due to the designation of wilderness areas with local units of government required to bear the bulk of such costs.

2-3 We still wonder if the Clan Alpine and Desatoya Mountains qualify as wilderness due primarily to the expected increase in supersonic activities proposed by the Navy. The Supersonic Operations Area as laid out by the Navy encompasses approximately 5000 square miles of north-central Nevada. A conservative Navy estimate indicates that at least 100 sonic booms will be created per day. This would certainly compromise the possibility of enjoying a "wilderness experience" due to the lack of "solitude", one of the prime criteria of any wilderness area. This was one of our primary arguments in previous testimony and continues to be a valid concern. The cost associated with the development and management of wilderness areas proposed in the preferred alternative could end up being wasted if military aircraft operations continue to expand as proposed.

2-4 The Churchill County Commissioners recently became aware of HR2379, a bill being considered by Congress which could impose federal land-use controls on commerce and industry outside the borders of federal conservation lands. The bill, if implemented, would impose a "buffer-zone" which would control activities adjacent to national parks, refuges and wilderness sites. The effect of such legislation could be far reaching and might impact mineral and energy exploration and production. We know that the Dixie Valley area in

-3-

Response Letter 2

2-3 The impacts of supersonic air operations upon solitude in the four WSAs was dealt with on pp. 2-5 of the Lahontan Wilderness Technical Report. It is recognized that increased supersonic overflights would have a significant impact on solitude opportunities. The Wilderness Act requires that an area have outstanding opportunities for either solitude or primitive and unconfined types of recreation. At this time the wilderness characteristics of the areas proposed for designation are of such high quality that our analysis indicates that the wilderness values outweigh the impacts of the overflights.

2-4 The Federal Land Policy and Management Act of 1976 requires that the Bureau complete its wilderness review process and submit its recommendations to Congress. Both the designation of certain lands as wilderness and the possible institution of "buffer zones" around these lands will require Congressional action. It is beyond the scope of this document to analyze the impacts of potential future legislation about "buffer zones".

Comment Letter 2

Churchill County is rich in geothermal potential and we cannot help but wonder if designation of a portion of the Clan Alpine Mountains as wilderness could ultimately halt or severly curtail continued development of such resources.

In addition, the old Wonder mining district, located just south of the proposed Clan Alpine wilderness area has recently been purchased by a large firm and the extraction of minerals by the open pit method is expected to commence shortly. We are concerned that HR2379 may adversly impact this very important economic boon to Churchill County.

2-5 Finally, the proposal to dispose of public lands identified as suitable for transfer to private ownership is supported by the residents in Churchill County. We note that the BLM intends to reserve rights-of-way to preserve access to public lands as outlined in the Standard Operating Procedures section in Chapter 2 of the Draft Document. We would request that a minimum 60 foot easement be reserved and that such easement extend to the nearest public road. This would ensure access to public lands but, also would allow adequate right-of-way consistent with Churchill County Ordinance to enable development of roads serving private lands. We also wish to remind you that Churchill County does have a zoning ordinance in effect. Because of this we request that the Bureau of Land Management consult with the County prior to determining minimum parcel size suitable for disposal in any particular area. Most outlying lands in Churchill County require a minimum 20 acre parcel size, to be consistent with the zoning code.

-4-

Response Letter 2

2-5 The areas identified for transfer from federal ownership in the RMP meet the preliminary disposal criteria within the scope of the planning process. Specific areas to be disposed of, size of tracts, method of disposal, or the timing of disposal are not known at this time. The primary authority for disposal would be the sale provisions of section 203 of the Federal Land Policy and Management Act (FLPMA). The regulatory controls and guidance under this authority mandate the analysis of a specific disposal, including the preparation of an environmental analysis and local government input. If, based on that analysis, a decision is made to dispose of the lands, a notice of realty action will be distributed to interested parties and published with a right of protest. Final action to proceed or not with the disposal would occur upon completion of the protest period. FLPMA requires that land classifications be consistent with state and local government programs, plans, zoning, and regulations applicable to the area in which the lands are located to the extent that those programs, plans, zoning, and regulations are consistent with Federal laws and regulations applicable to the public lands.

Comment Letter 2

We trust that our comments will be considered in the final draft of the Lahontan Resource Management Plan and Environmental Impact Statement.

Sincerely,

CHURCHILL COUNTY BOARD OF COMMISSIONERS

JOHN SERPA, Chairman

BILL LEE, Member

MELBA ALLDREDGE, Member

cc: Tom Owen, District Director

-5-

Comment Letter 3

District Manager, BLM
Carson City District
1050 E. William Ste. 335
Carson City, NV 89701

Dear Sir:

In your recent public hearings in Fallon I am sure some speakers expressed the importance of grazing in the local economy and the need to maintain or increase current AUM levels. But overall, the economy - long term - depends on the condition of the range. Total cost to all taxpayers will be less if the habitats present are not abused.

Intangible economic benefits include natural resources such as wild sheep, deer, chukar, quail and sage grouse. Their habitats should be maintained in good to excellent condition so adequate populations will be available for public benefit.

My suggestions on the listed issues and alternatives are as follows:

Comment Letter 3

1 a. Livestock – Resource protection. Grazing should be reduced and spring grazing deferred. Riparian habitats should be protected. Reduce wild horses so cattle reduction would be less.

b. Wild Horses – Commodity Production. Severely reduce or eliminate wild horses to benefit wildlife and livestock and the range.

c. Wildlife – Resource Protection. Manage for 3,201 AUM's or more. Protect 53 or more miles of stream. Actually if habitat is protected and managed for wildlife, eventually livestock AUM's can be increased based on rangeland condition class improvements. Cattle will be in better condition and bring a greater economic return to permittee

2. Wilderness – select between 150,000 to 175,000 acres

3. Lands – Resource Protection. Dispose of only minimal amounts. This is public land that belongs to all of us. Do not sell it!

Sincerely,
M. C. Le Haven
1844 Cherry Ln
Fallon, NV 89406

Comment Letter 4

BERNSHAW PHOTOGRAPHY
BOX 299
BLAIRMORE, ALBERTA
T0K 0E0

November 15, 1983

District Manager
BLM
Carson City, Nev.

Dear Sir:

I wish to make a few general statements for your consideration regarding RMP, EIS and WSA's in the Lahontan Resource Area.

(1) Grazing. You must curb overgrazing. You have every right to set levels for grazing on the public lands, so I urge you to set levels that will restore the range. In addition, you might consider competitive "free-market" bids in establishing a more realistic price for grazing rights.

(2) Range Improvements. Quit subsidizing improvements with funds beyond what is collected in grazing fees. Charge higher fees, or quit making "major project" improvements.

(3) Wilderness. Wilderness land is a rare commodity in the lower-48 States. Future generations will appreciate wilderness-protected lands greater in the future than locals appear to now. Only vital other resources should prevent a w.s.a. with high wilderness values from being recommended as such. Please be favorable towards wilderness values.

Yours truly,

Elliott Bernshaw
A former resident

Comment Letter 5

TRANS-PACIFIC GEOTHERMAL, INC.
1419 Broadway, Suite # 415, Oakland, CA 94612
(415) 763-7812

Nov 14 12 21 PM '83

November 11, 1983

Bureau of Land Management
ATTN: Terry Knight
1050 E. Williams, Suite 335
Carson City, NV 89701

Dear Terry:

Sorry to have missed you at the Lahontan Public Wilderness Meeting November 9th in Reno. I had made it a point to introduce myself but fell through on the follow through!

Enclosed please find a written copy of TGS Associates' statement regarding the Stillwater Study Area to be considered in your final review and recommendations.

I left my card with a gentlemen from your office so that I might receive a copy of the Lahontan RMP; please forward at your earliest convenience.

Sincerely,

Paula Stryker

Paula Stryker
Associate Landman

PS/lkp

Enclosure

Comment Letter 5

TRANS-PACIFIC GEOTHERMAL, INC.
1419 Broadway, Suite # 415, Oakland, CA 94612
(415) 763-7812

November 9, 1983

TGS ASSOCIATES'STATEMENT REGARDING
WILDERNESS STUDY AREA (NV 030-104)

TGS Associates has geothermal leases in 13 sections of land which are within or adjacent to the eastern boundary of the Stillwater Range Wilderness Study Area (NV-030-104). This prospect, which lies in T23N, R35E, MDM, formerly leased by Southland Royalty Company, and jointly developed by Thermal Power Company, is now owned by TGS Associates. The designation of the Dixie Valley Road (Route 380), proposed by the September 1983 Technical Report as the eastern border of this Wilderness Area, would impose strict limitations on the development of this prospect, and it is to this particular issue that we address our comments.

Our company is committed to further exploration and development of the geothermal resources of this area. Data from the two wells drilled by Thermal Power Company, in or near this prospect, have indicated high temperatures. In general, surface exploration within T22N, T23N, R35E, indicates a high probability that a productive resource might exist.

There is a growing conviction in the geothermal community that this area deserves to be further explored and tested. A recent discovery by TGS Associates on acreage north of the Lamb Ranch (T25N, R37E), and the recent Federal lease sales have triggered greater interest and increased leasing and exploration activity in Dixie Valley in general. Specific to this area, around Dixie Hot Springs southward (T22N, R34 and 35E), new players have entered the game, leases are changing hands, and geophysical exploration is now accelerating. These are all indications of increasing interest in the further development of this part of the Valley.

It is most likely that the productive geothermal zone would be found on the valley floor rather than in the mountains. The lower areas of the Stillwaters are steep, sloping at an angle of around 35° on the lower portions. Vegetation there is

Comment Letter 5

Wilderness Study Area Statement
Nobember 9, 1983
page 2

sparse, the larger game animals do not inhabit this region, and for the most part, confine themselves to the central mountainous areas; opportunities for recreation and camping are minimal on the lower slopes. Further, the possible increase in the noise from low flying aircraft, which would result if the Navy is permitted to extend its program, would minimize altogether the opportunity for solitude and many of the outdoor activities associated with a natural environment.

Furthermore, the geothermal companies in Dixie Valley are now studying alternate electrical power transmission routes from the Sunedco and TGS geothermal fields north of the Lamb Ranch, which would run southwesterly toward Highway 50. The preferred route would position the corridor approximately along the road, but, in some places it would be necessary to run it approximately 50 yards to the west of the road, to avoid the Humboldt Salt Marsh on the east side. This optimal routing would reduce the cost of power line installation and servicing. So, for purposes of the transmission line, it is also deemed desirable that the alluvial fans west of the road be excluded from the Wilderness Study Area.

5-1 Given these considerations, TGS Associates recommends that the eastern boundary of the Stillwater Range Wilderness Study Area be moved one to two miles westward to coincide with the point where the mountain slopes touch the alluvial fans. This boundary would provide geothermal companies with the opportunity to explore and develop the valley floor, which is potentially the most productive area, while impinging minimally on the mountain region where the majority of activities protected by wilderness areas are enjoyed.

Attachment: map

TRANS-PACIFIC GEOTHERMAL, INC.

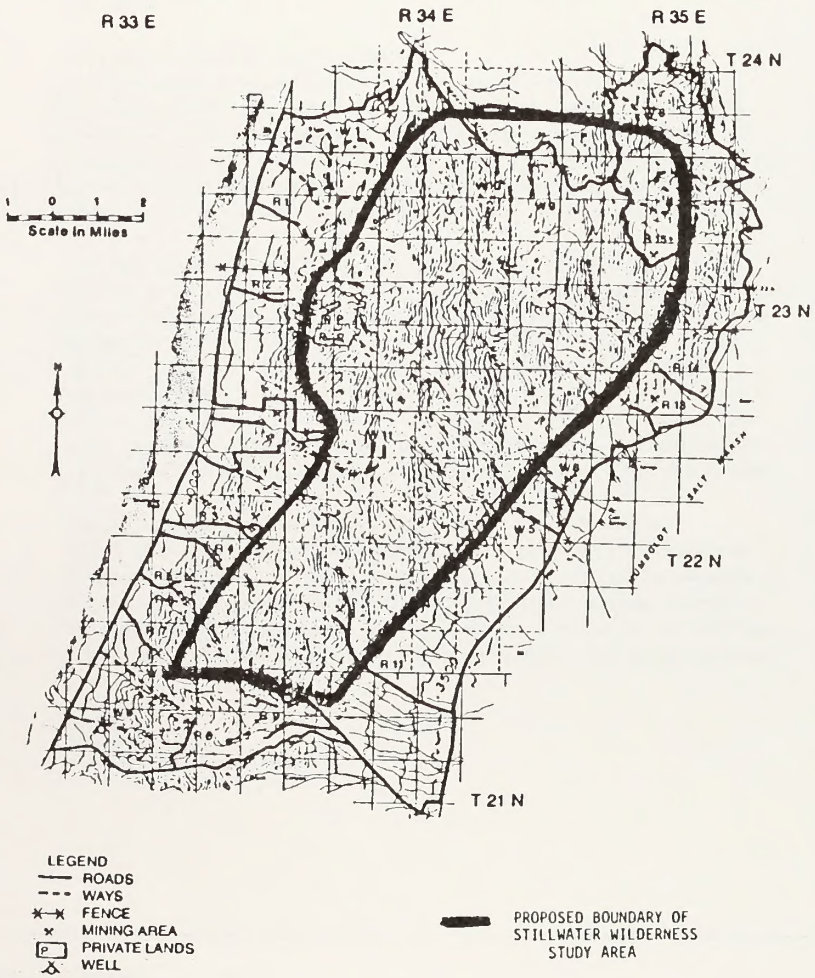
Response Letter 5

5-1 This alternative has been considered as part of the Mid Range alternative (page 2-8). It should be noted that the entire study area has been eliminated from wilderness considerations in the preferred alternative.

Comment Letter 5

Attachment

The attached map describes the area which, in the opinion of TGS Associates, would serve the interests of a Wilderness Area without interfering with geothermal activities.



Comment Letter 6

2921 NE 55rd Street
Lighthouse Point, Florida 33064
November 14, 1985

District Manager
Carson City District
1050 E. William, Suite 335
Carson City, Nevada 89701

Dear District Manager:

I urge the establishment of four wilderness areas totaling 432,200 acres. The four additions to the Wilderness System that I recommend are : Clan Alpine Mountains, Stillwater Range, Desatoya Mountains, and Job Peak. I also recommend no land disposal in Dixie Valley or Edwards Creek Valley. I lived in Nevada for twenty years. These additions to the Wilderness System are necessary for diversity of the system and their recreational, wildlife, scenic, and primitive values. Thank you for this opportunity to comment.

Sincerely,

Reed Secord

Comment Letter 7

628 Lake Street
Reno, NV 89501

Tom Owen, District Manager
1050 E. Williams St.
Carson City, NV. 89701

Dear Mr. Owen:

7-1 I am writing to let you know of my concerned support of the Clan Alpines, the Desatoya Range, the Stillwater Wilderness Study Alternative and Job's Peak areas as deserving and in need of wilderness status for protection in a natural state.

In the Clan Alpines I endorse the Midrange Alternative of 150,000 acres which includes Mt. Augusta and excludes roads and mining activity to be found around the edges. I think this area is particularly deserving due to the archaeological interest there.

The Desatoya Range is an area I have personally enjoyed for its lower elevation (it's accessible before other areas in the Spring when cabin fever is greatest). It's canyons offer a desert experience with rock formations and a spectacular waterfall and its high country offers a more alpine environment. This area is greatly deserving of wilderness status and protection.

I am distressed that the Job's Peak area was not recommended by BLM under its Preferred Alternative for this WSA as a wilderness. It is a favorite for hikers and rock climbers alike. While I've not been able to make it up the peak from the valley floor, I did approach the peak from the back side and find the ruggedness and solitude of the area outstanding. This area together with the Stillwater WSA in the northern part of the Stillwaters should be given high priority as they are relatively close to large population centers (Reno and Lake Tahoe) and could take some pressure off the overrun Desolation Wilderness. These high areas should be preserved particularly the heart of the midrange areas as recommended by more knowledgable conservationists. Multiple use can apply to the peripheral areas while keeping the most spectacular and primitive lands in a more natural state.

I realize difficult decisions and compromises must be made; but please err on the side of preserving too much. It's so much easier to undo preservation than it is to undo development. As a psychologist I believe there is a tangible decrease in the quality of life with the loss of lands such as these. The public needs healthy, natural unscarred land much more than mines, resorts, or suburbs. Land that can't support deer, bear and other wildlife won't support us either, sooner or later.

Sincerely,

Edward P. Galantowicz, Jr.

Response Letter 7

7-1 An additional seventeen letters received were very similar to this one from Mr. Galantowicz. Due to the prohibitive costs of printing these letters they have not been reproduced in this document pursuant to Council of Environmental Quality Regulations (CFR 1503.4(b)). These letters were from the following individuals: Courtney Smith, Edward Diver, Barbara Kelley, Carola P. Hutcherson, Gayle Marrs Smith, Steven Thaw, Marjorie Sill, Dennis Trease, Cheri Conoske, Denise Smith, Gregory Ebner, William Kersten, Earl Kersten, Ann Kersten, Bettey Kersten, Laura Kersten King, and Gary King. Although the number of letters received expressing a particular point of view about the Resource Management Plan (RMP) does not necessarily give that point of view more weight in the process, each letter from those individuals listed above has been considered in the development of the proposed RMP in this document. Those letters are available for review at the Carson City District Office.

Comment Letter 8

UNITED STATES GOVERNMENT

memorandum

DATE: DEC 8 1983

REPLY TO ATTN OF: ASSISTANT Phoenix Area Director

SUBJECT: Draft Resource Management Plan and Environmental Impact Statement for the Lahontan Resource Area, Nevada (INT DRMP/EIS 83-66)

TO: Nevada State Director
Bureau of Land Management
Suite 335, 1050 East William St.
Carson City, Nevada 89701

A review of the subject document has been completed. Our Branch of Land Operations believes there may be indirect impact on the Tribes in this area. Therefore, we request that you keep the Western Nevada Agency and tribal officials informed of your decisions in the National Environmental Policy Act process.

OPTIONAL FORM NO. 10
(REV. 1-80)
GSA FPMR (41 CFR) 101-11.6
5010-114

☆U.S. G.P.O. 1983-381-526/8401

Comment Letter 9

United States Department of the Interior
~~WATER AND POWER RESOURCES SERVICE~~
BUREAU OF RECLAMATION
MID-PACIFIC REGIONAL OFFICE
2800 COTTAGE WAY
SACRAMENTO, CALIFORNIA 95825

IN REPLY REFER TO: MP-150

DEC 02 1983

To: District Manager, Carson City District, Bureau of Land Management, Carson City, NV

From: Acting Regional Director, Sacramento, CA

Subject: Draft Resource Management Plan and Environmental Impact Statement for the Lahontan Resource Management Area, Nevada (DES 83-66)

Our comments regarding this document are as follows:

1. Introduction, Alternatives (page 2-1) - The introductory paragraph states "each (alternative) emphasizes a different balance between resources." It would be more correct to state "each emphasizes a different utilization of resources."

9-1 2. Standard Operating Procedures, No. 23 (page 2-17) and Alternative Map, Land-Disposal (page 2-25) - A portion of the public lands designated as suitable for disposal is involved in local controversial issues and requires further analysis in regard to these issues. Some of the lands identified for disposal lie within the Truckee Division of the Newlands Project; some of this benchland receives irrigation water from the Truckee River via the Truckee Canal. These lands are currently involved in a protracted dispute over water rights in the Truckee-Carson Basin and land disposal may further complicate the situation.

9-2 Also, the lower Truckee River and its terminus, Pyramid Lake, are essential habitat for two Federally-listed species, the endangered cui-ui (Chasmistes cujus) and the threatened Lahontan cutthroat trout (Salmo clarki henshawi). Because of these species' tenuous existence, specific analysis of potential impacts from land disposal is necessary.

Thank you for the opportunity to comment.

R Graham

Copy to: Commissioner, Washington, D.C.
Attention: 150

Response Letter 9

9-1 The Carson City Office of the Bureau of Reclamation indicates that proposed land disposals will not affect the litigation over water rights. Further consultation with interested parties will occur prior to disposal of particular parcels.

9-2 An evaluation of specific impacts to threatened and endangered species will be prepared prior to disposal of particular parcels. If it is determined that any impacts would occur, they will be mitigated or the lands will be retained in public ownership.

Comment Letter 10

[illegible]
555 [illegible] Rd
Northford, CT 06472
Nov 26, 1983

Dear Sirs,

Please send me a complete copy of the Lahontan RMP + EIS + Wilderness Technical Report. Since I may not be able to comment on the complete document before Jan 3, however, I will make a few remarks on the scoping.

I strongly urge adoption of the Resource Protection Alternative or modification of the Preferred Alternative in two areas. First, all 53 units of sheep should receive increased protection. Bighorn sheep are the most significant wildlife feature in Nevada & have been heavily damaged by grazing. Second, the tiny wilderness recommendation in the Preferred Alt. is a travesty. All four areas (with possible minor boundary modifications) should receive complete protection. Wilderness will soon become a scarce commodity in Nevada at the present rate of development. These are fragile & unique areas whose designation would enhance, not hurt, the economy of the District. I strongly urge their protection.

Sincerely,

[illegible]

Comment Letter 11

RESOLUTION NO. 24-83

A RESOLUTION BY THE CHURCHILL COUNTY PLANNING COMMISSION IN SUPPORT OF CHURCHILL COUNTY COMMISSIONERS POSITION WITH RESPECT TO DRAFT LAHONTAN RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, EXPRESSING CONCERN OVER THE CONTINUED DESIGNATING OF A PORTION OF THOSE AREAS ORIGINALLY IDENTIFIED AS WILDERNESS AREA AND OTHER MATTERS PROPERLY RELATING THERETO.

WHEREAS, the Bureau of Land Management commenced an inventory of lands in Churchill County in 1980 suitable for wilderness designation, and

WHEREAS, the Bureau of Land Management at that time designated approximately 450,000 acres of public land within the Lahontan Resource area as having wilderness potential, and

WHEREAS, Churchill County, private persons and organizations protested the designation for various reasons including the lack of economic feasibility, the destruction of a portion of our community's economic base resulting from the closure to most mining and grazing interests and the usurpation of the multiple use concept of public lands, and

WHEREAS, the Bureau of Land Management has recenty released the Lahontan Resource Management Plan and Environmental Impact Statement, and

WHEREAS, the Draft Document, "Preferred Alternate" recommends a more moderate course of action than originally proposed. Now Therefore Be It Resolved by the Churchill County Planning Commission to support the position of the Churchill County Commissioners regarding their comments on the Draft Lahontan Resource Management Plan and Environmental Impact Statement, and

Be It Further Resolved that the Planning Commission expresses its concern for the continued designation of a portion of those lands orginally identified as having wilderness potential due to the lack of cost effective means for the Bureau of Land Management to manage these resources.

-1-

Comment Letter 11

This resolution shall be effective on the 14th day of December, A.D., 19 83.

PROPOSED AND ADOPTED THIS 14th day December of A.D., 1983.

THOSE VOTING AYE: William Matson
Ernie Heying
Liz Martin
Aldo Benedetti
Buzz Fitzpatrick
Dan Urquhart
Willis Swan

THOSE VOTING NAY: None

CHURCHILL COUNTY PLANNING COMMISSION

By: William R Matson
William R. Matson, Chairman

ATTEST:

Debra M Sayre
Clerk of the Board

-2-

NATIONAL PUBLIC LANDS TASK FORCE
NEVADA OUTDOOR RECREATION ASSOCIATION, INC.
November 30, 1983

P.O. Box 1245
Carson City, Nevada 89702

Mr. Thomas J. Owen
Carson City District Manager
U.S. Bureau of Land Management
1050 East William Street, Suite 335
Carson City, Nevada 89701

Testimony: Lahontan Resource Area RMP and Draft EIS

Dear Tom:

We cannot think of a time when this organization has had to choose words of the gravest terms. What we see in the Lahontan Resource Area Management Resource Plan and draft Environmental Impact Statement--is a serious erosion of the BLM's ability to function professionally. Indeed, we cannot recall a single time where we had to register four--count 'em, four--strenuous protests involving failure to obey National Environmental Policy Act(NEPA) and Federal Lands Policy & Management Act(FLPMA) law and regulations. This is, without a doubt, the worst generic planning and EIS proceeding we have seen initiated in all our 25 years experience in BLM Public Lands.

12-1 FIRST PROTEST--Privatization of Public Lands: In all of the viable alternatives the district proposes to sell and/or dispose of--fully 5% of the Public Lands in the Resource Area! 116,500 acres to be sold and it is even contained in the so-called Resource Protection Alternative. We want to believe this is a case of someone not getting the word....that the USDI Secretary and the Property Review Board* had unequivocally disowned this type of large scale-sale/disposal scenario on the Public Lands.

12-2 We could not find any hint of an effort to inquire into the consequences against wildlife habitat, flora, soils, threatened species, archeology, potential Areas of Critical Environmental Concern(ACECs), cultural values, open space preservation, recreation access & use, social impacts and economic & tax base implications.

Only recently, the city of Reno completed a major study on the rapidly deteriorating economic and environmental consequences and local government's ability to function in the face of ill-planned development. This has negative impact on services, sewage treatment, streets, energy demand, air & water quality. Not one iota is given to this scenario....on the contrary, the thrust justifying disposal is almost exclusively devoted to economic benefit. The BLM proposes agricultural sales; we presume via Desert Land Entry....knowing as we both do, the chronic and tragic failure rate DLE's have had for decades. DLE's have invariably led, sometime down the road, to ruthless land speculation in Nevada. It must be removed from the RMP.

12-3 SECOND PROTEST--failure to Designate A.C.E.C.s: The district has completely omitted in the RMP all mention and reference to FLPMA Section 102(a), which requires the identification and meaningful designation of ACEC sites and areas in the district. NORA

*see attachments

(continued)

12-1 The RMP has a range of alternatives for proposed land disposals of from zero (case by case) to 116,500 acres. It includes a Resource Protection alternative which proposes 2100 acres.

12-2 Please refer to Chapter Four of the Draft RMP/EIS. Impacts of land disposals have been analyzed throughout this chapter. Specifically, impacts to flora (vegetation) are analyzed on pages 4-11, 4-13, 4-26, and 4-39; impacts to cultural and archaeological resources are analyzed on pages 4-16, 4-30, and 4-43; impacts to open space (visual resources) are analyzed on pages 4-15, 4-29, 4-30, and 4-43; social impacts are analyzed on pages 4-24, 4-37, and 4-50; economic and tax base impacts are analyzed on pages 4-21 and 4-35. The potential negative community service impacts (which encompass sewage treatment and streets) are analyzed on pages 4-21 and 4-35. No impacts to recreational access were included because, as page 2-17 states, public access will be reserved prior to disposals of land. No impacts to air quality or threatened or endangered species were included because it is standard operating procedure for the Bureau to avoid actions which impair air quality or harm threatened and endangered species. No significant impacts to wildlife habitat, soils, energy demand, water quality or Areas of Critical Environmental Concern could be determined.

Comment Letter 12

Lahontan Resource Area RMP & Draft EIS(continued) page two

12-3 has consistently brought its well-known Nevada Outdoor Recreation Resources Index & Survey(herein and hereafter referred to as the "NORA Index & Survey") into the district for at least the last 15 years. Yet, there is not a single reference to it in BLM's glossary or text. In May 17, 1967, the BLM director issued a decision which required the NORA Index & Survey to be fed into BLM planning systems and implemented. We are enclosing a copy of this decision as an addendum to this statement.

A factor in this protest--i.e., failure to designate ACECs--is in regard to almost total absence of discussion of the impacts of the DoD military withdrawal consisting of approx. 127,000 acres. In our NORA Index & Survey, these are some of the ACECs identified, many of which are in direct conflict with the proposed military withdrawal:

(a) Singing Sand Mountain--a major scenic dune system containing dens with far-north occurrences of desert kit foxes and at least two species of Aegialia(new species found in 1977) and Cardiophorus(new species, also identified in 1977). Adjacent to the dune is a critical ACEC cultural site--remnants of the only known Overland Stage/Pony Express station (with 13 known well diggings) in the 40-Mile Desert.

(b) Graves Cliffs/Grimes Point Archeological Zone--a major post Ice Age (approx. 5000 B.C.) Fremont/Anasazi Culture urban center along the ancient shoreline of Lake Lahontan, near Fallon. This area contains critical ancient campsites, vital middens, petroglyphs and artifact impacted caves.

(c) Dixie Valley 1954 Earthquake Fault--a major scientific and geological interpretive zone containing perhaps record single occurrence fault exposures. In the NORA Index & Survey, photographs taken as early as 1957(by NORA co-founder George Kell, Sparks, Nevada) show sudden uplifts and shifts of 12 feet! These are located on both sides of Dixie Valley and on the flanks of Fairview Peak.

(d) Lahontan Petroglyphs Area--located in a wide zone along the eastern shore of Lake Lahontan(reservoir) are scattered rock monoliths with intricate petroglyphs. These are some of the most intricate in the state, as shown by early Alvin McLane photos and sightings dating back to early 1960s(in the NORA Index & Survey).

(e) Soda Lake--recently, a decision by the USDI secretary persuant to a Federal court order mandated TCID withdrawn lands in this area back to BLM jurisdiction. Soda Lake was identified early in the history of the NORA Index & Survey(in 1959) as an outstanding geological natural area. It is a large sink-hole area northwest of Fallon, and including remnants of the Old California Trail. It contains a large natural briny lake set at the bottom of a scenic crater. Under TCID management, it suffered from grievous neglect. Indeed, it is at this this time being used as a dumping ground. It is an outstanding natural wonder deserving of full ACEC protection.

THIRD PROTEST--failure to advise conservation leaders on BLM mailing list:

12-4 Early in November, only a few days before the oral hearing in this proceeding, we learned of the release--as early as late September--of both the RMP/EIS and the draft Technical Report on wilderness. Almost all Nevada conservation leaders were forced to seek out and obtain copies of the draft RMP/EIS and Tech. Report. In the oral hearing and in a letter to BLM State Director Ed Spang, we asked for a reasonable delay in the written comment period until February 1, 1984. Many out-of-state citizens had asked NORA to keep them informed of important Nevada BLM proceedings. Thus, for whatever reason surrounding the district's failure to send the reports to those on

(continued)

Response Letter 12

It is anticipated that the first parcel of the acreage identified in the Draft for disposal will be transferred to the State of Nevada for expansion of Lahontan State Park. Impacts of this action will be analyzed in an environmental assessment, however they are expected to be positive.

This RMP is not a final decision to offer land for sale. It identifies lands that meet the disposal criteria outlined in Section 203 of the Federal Land Policy and Management Act. Specific areas to be disposed, size of tracts, method of disposal, or timing of disposal are not known at this time; these specifics will be determined as the plan is implemented and for each disposal action. At that time more detailed site specific environmental assessments will be prepared and public and local government input will be obtained. Lands determined to be unsuitable for disposal at that time would be retained in federal ownership. It should further be noted that all DLE applications will be rated on a site specific basis as to agricultural suitability, erosion susceptability, cultural resources, mineral values, and water availability and quantity.

12-3 Areas of Critical Environmental Concern (ACECs) are special places within the public lands where special attention is given to the protection of ACECs for the purposes of ensuring that the most environmentally important and fragile lands will be given early attention and protection.

Important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes are eligible for ACEC status as well as areas where action is needed to protect life and safety from natural hazards.

The identification and designation of ACECs are separate steps within the RMP process. During the identification phase, potential areas are evaluated based on two criteria: relevance and importance (see Federal Register Vol 45, No. 168/8/27/80 pages 57323-57324 for Criteria Identification). In evaluating potential areas through the Lahontan RMP, two sites, Sand Mountain and Grimes Point, were thought to meet the criteria. However, both Sand Mountain and Grimes Point have been formally designated and protected through previous planning efforts (Ft. Churchill-Clan Alpine MFP of 1976). Sand Mountain is a BLM Recreation Area and Grimes Point is an Archaeological Area. Both areas have site specific management plans developed, have been withdrawn from the mining and land laws, have fencing, trails, interpretation, signing, ranger patrols, ORV barriers and ORV closures enacted on all or portions of the areas. In other words, these areas have already been given attention and protection. BLM staff members felt that the purpose of ACEC designation--"early attention and protection"--had already been met at these sites. ACEC designation would not change current management of these two areas or provide further protection.

Other areas which have been nominated for ACEC status in various comments are listed below, with explanations.

Response Letter 12

Dixie Valley Earthquake Faults

Although the Dixie Valley fault scarp is an interesting geological feature, we do not feel it warrants ACEC status. High angle faults are by far the most common structural features in Churchill County (Nevada Bureau of Mines and Geology Bulletin 83, pg. 34). The 60 miles of fault scarps left from the 1954 earthquakes range from as little as one inch to as much as 12 feet high and are no different than many other fault scarps which may be found throughout the western U.S. The limited scientific, geological and public interest values of the Dixie Valley scarps will be kept intact through normal land management practices and are not in danger of destruction from man-made causes.

Graves Cliffs and Caves (Hidden Cave area) - The majority of this area is contained within the Grimes Point Archaeological area mentioned previously.

Carson Sink Sloughs - Lending the term "slough" or "marsh" to the area of salt flats which extends north from the Stillwater National Wildlife Refuge is an exaggeration. During most years this area is a dry, barren alkali lakebed. During very wet years this areas does flood seasonally and waterfowl do take the opportunity to expand their habitats. It is an ephemeral opportunity at best however, as within a few weeks the salt flats dry out or turn to mud. This area does not qualify for ACEC status.

Wonder Ghost Town - There is very little left of the town of Wonder other than foundations and garbage dumps, and most of these sit on patented mining claims (private land). We are unaware of any sedimentary formations in the Wonder area containing significant fossil deposits, which might be used as justification for ACEC status.

Kaleidoscopic View - This proposal does not meet the minimum ACEC criteria of importance or relevance since views of the Lake Lahontan lakebed are common throughout the RMP area. Identification or designation of a viewing point would not protect the view itself. Panoramic views of the Lake Lahontan lakebed are already interpreted on both the Grimes Point and Hidden Cave interpretive trails.

Lahontan Petroglyph Area - The only known petroglyph around Lahontan Reservoir is the Erikson Point petroglyphs. Since these petroglyphs are on private lands, they are not appropriate for ACEC identification.

Soda Lake - Since Soda Lake was returned to BLM management after publication of the Draft, it was not included in the Draft. Based on this and other comments on the Draft, the BLM staff has analyzed Soda Lake and has proposed it for ACEC designation.

12-4 On September 28, 1983, 519 copies of the summary or complete Drafts were mailed to interested individuals, businesses, and interest groups as well as federal, state, and local government agencies.

Copies were made available for public review at BLM offices and public libraries throughout the state. On the same date a press release announcing the availability of the Draft RMP/EIS was issued to newspapers, radio, and television stations throughout the state. In addition, notice of the availability of the Draft was published nationally in the Federal Register on October 7, 1983. Opportunities for the public to provide oral comments were provided at public hearings in Reno on November 9th, and in Fallon on November 10th. In response to public interest an additional public hearing was held in Carson City on December 1st.

Comment Letter 12

the mailing lists, several interested individuals and groups will be effectively denied an opportunity to testify.

12-5 FOURTH PROTEST--"generic" consideration of Job Peak WSA:

We have never before, anywhere in the BLM, seen a situation where wilderness values were even acknowledged and recommended in the Commodity Production Alternative(as well as all the other viable alternatives)....and then given a "no wilderness" recommendation in the Preferred Alternative. FLPMA Section 603 mandates the BLM to meaningfully assess wilderness in relation to the conflicts involved. A recommendation for wilderness in the Commodity Production Alternative for all practical purposes, is an admission that the Job Peak WSA (NV-030-127) has wildland that outweighs the conflicts. Under the Congressional mandate, the BLM must recommend wilderness. The Technical report contains no justification for a "no wilderness" recommendation. In fact, portions of the inventoried WSA are acknowledged to have high wilderness value.

Job Peak is one of the most scenic and rugged ridges in the district. It is already one of the most popular with youth groups. The central peak has astonishing views of the Stillwater Marshes and is highly regarded by hikers in the Reno-Sparks-Carson City area for its primitive recreation experience. It contains the highest peak in the Stillwater Range and is noted for its stark rock formations. The WSAs wildland character is acknowledged also by its selection as a desert bighorn sheep reintroduction habitat area. We are especially concerned for the eastern portion of the range--including Box Canyon, Little Box Canyon, and East Lee Canyon. Including the summit area, it is an important raptor area for golden eagles and is a permanent habitat for great horned owls. The area has sheer walls that have become challenges for mountaineers and rock climbers. NORA urges designation of 37,000 acres of the Mid-Range Alternative and an additional 11,500 acres in the central peak area....for a total of 48,500 acres.

OTHER WILDERNESS RECOMMENDATIONS:

(a) Desatoya Mountains(NV-030-110)--we endorse the Preferred Alternative of 43,045 acres. The NORA Index & Survey has long recognized the ruggedness and exceptional primitive character of the region. Indeed, this range was designated in 1959 by the Outdoor Recreation Resources Review Commission(ORRRC). Most notable is Big Den Canyon with its towering spires, overhanging cliffs, scuptured and twisted formations....and its unique 30 ft. perennial waterfall. NORA explorations dating back to the mid-1960s have revealed highly scenic, well-watered and densely forested canyons, hidden coves, vital riparian habitat and spectacular rock formations. The range is rich in both spring and autumn wildflower displays, fall foliage, and alpine majesty--the latter seen on peaks rising nearly 10,000 feet. It is known to us as an area of great ecological diversity.

(b) Stillwater Range(NV-030-104):

This is one of the districts more sublime wilderness areas, much of it centering around colorful and scenic Mississippi Canyon. It is augmented by a contiguous and remote area dominated by Hare Canyon. The latter is exceptionally remote and primitive. The range is not as dry as the Techical Report implies....indeed, it is prime habitat for deer, golden eagles, and such unusual flora as smooth phacelia. While the area lacks a single, dominating ridge, it has numerous well-hidden coves and primitive canyons. There are important riparian sites and a primitive recreation experience is afforded by well-screened pinyon-juniper forests. Portions of the vital Dixie Valley 1954 earthquake fault, a recommended ACEC, form the boundary of the WSA on its eastern approaches. Again, we can find no justification

(continued)

Response Letter 12

12-5 The four alternatives analyzed for the Job Peak WSA present a range of management options from "All Wilderness" to "No Action". Although the "Commodity Production" alternative identified lands which might be recommended as suitable for wilderness designation, this alternative did not eliminate all resource conflicts and/or manageability problems. Wilderness values were rated "good", not "high", in the area which remained under consideration.

The Bureau is not required by either the Wilderness Act or any regulation, instruction memorandum or policy statement to recommend as suitable those lands identified for possible wilderness designation in any particular alternative. It is the Bureau's obligation to examine the impacts of each alternative and then make a recommendation based on a reasoned analysis of the factors involved and with due regard to the public interest.

After conducting this analysis and considering public comments made during the scoping process, it was determined that the Job Peak WSA should be recommended nonsuitable for wilderness designation.

Comment Letter 12

Lahontan Resource Area RMP/EIS (continued) page four

(cont'd.) for the "no wilderness" recommendation for this WSA.

12-6 We can visualize some "cherry-stemming" of gold and flourite occurrences along the western approaches to the range. We have noted in BLM records so-called "raods" on the west side. For the most part, they are legitimate ways and trails. Recent storms have made these impassible, even to 4 x 4 vehicles. Almost all recieve no regular hand-tool maintenance within the 1979 definition made by USDI Secretary Cecil Andrus. Even the one seemingly valid claim of a maintained road in Lee Canyon(Job Peak WSA) is clearly shown to be a "way" in the BLM's own aerial photographs. The situation is identical in the Stillwater Range--and allows for at least a designation of 40,000 acres as wilderness. Indeed, we view the BLM's "no wilderness" recommendation as an especially serious attempt to impede their clear Congressional mandate to impartially identify wilderness values.

(c) Clan Alpine Range(NV-030-102):

Of all the wilderness areas in the district, this lofty Great Basin range complex has the most widespread primitive and wilderness solitude conditions. At least five canyon systems--Bench, Byers, Dyer, Florence & Horse Creek Canyons--possess important watershed and riparian values. This is one of the most heavily forested WSAs in west-central Nevada. It contains vital, ancient groves of mountain mahogany perhaps deserving of dendrochronological and Ice Age scientific research. The range is dominated by 9,966-ft. Mount Augusta and is truly a majestic summit, augmented by several alpine peaks rising over 8,000-ft. The area has caves and adits, and is recognized by the NORA Index & Survey as an outstanding base-camp wildland--from which primitive recreation and exploration can take place in all directions.

The WSA has numerous gorges, hidden canyons, additional seasonal streams, sublime rock formations, isolated springs, important riparian habitat that nurturs such wildlife as cougar, deer, eagles, owls, falcons and sage grouse. The district's Preferred Alternative recommendations of 68,458 acres shows why we have suspicions of anti-wilderness bias. The BLM is at odds with its own concept of resource protection--as evidenced by the Resource Protection Alternative's identification of 196,128 acres. A true conservative notion of meaningful wilderness protection is the Mid-Range Alternative of 158,504 acres. Indeed, this is what NORA recommends.

STATEMENT ON CONFLICTS:

Of late, the more extreme factions of the mining industry in Nevada....have pinned their hopes for discrediting wilderness on the Public Lands, on a scenario we've dubbed the "needle biopsy" phenomenon. This is based on the irresponsible notion that micro-sampling of stream washes and x-ray of tiny spot specimens, tends to render these WSAs "terminal"(as if they had cancer!). The effect is largely an anti-wilderness ruse. Indeed, such sampling can produce trace yields and/or "prot-ore"(unexploitable content) of iron, gold, magnesium, potassium, haloids, lead, zinc, silver and even uranium. Yet, our experience(25 years in Nevada) shows that the vast majority of so-called "valuable" mineral assertions are not backed up by proven, in-place, mar able, valuable and strategic minerals.

We have a point to make about gold--and its supposed conflict with wilderness. Reputable geologists call gold an "opulent" mineral, and some have actually stated its discovery in thin, widely disseminated bodies should not be regarded as a conflict with wilderness. Section 603 of FLPMA is crystal clear. So-called mineral finds that could similarly be made from the sidewalks of Disneyland, are not conflicts with wilderness. Congress required the BLM to find and report back by 1991 wilderness values on blocks of land over 5000 acres. Indeed, that is why Congress required USGS analyses after designation. The radical miners fully expect the BLM to knuckle under to political pressure and exempt them from assuming the burden of proof. If the BLM so much

(continued)

Response Letter 12

12-6 At the time of the completion of the intensive inventory (November 1980) all routes identified as roads in the four Lahontan Resource Area WSAs met the definition of a road found in the Wilderness Inventory Handbook, including the requirement for maintenance by mechanical means.

The past winter was extremely severe and did indeed make several roads impassable. Some have been repaired and maintained while others continue to be impassable due to their relative remoteness and the fact that they remained wet in places throughout the fall. Little if any maintenance will be performed this winter, however, there is no reason to believe that these roads will remain unrepaired this coming summer.

In an amendment made to the Intensive Inventory Report for the Job Peak inventory unit prior to the State Director's designation of the unit as a WSA in November 1980, the ways in East Lee and upper Elevenmile Canyons were redesignated as "substantially noticeable" intrusions and deleted from the area. This was done in full compliance with the Bureau's wilderness inventory procedures and no comments were received regarding this change. Maintenance of such routes along their existing alignments is allowed by the Interim Management Policy and Guidelines for Lands Under Wilderness Review.

(cont'd.) as considers doing such a thing, it would be committing a gross betrayal of their public trust. In addition, the BLM has an obligation to assess the mineral potential of the WSAs, on the basis of relative values both within and in the context of values on the surrounding Public Lands in the resource area and in the district.

The BLM cannot succumb to reckless charges that wilderness is a "lock up". It is not! By all reckoning, wilderness is legitimate form of multiple use. No one is harmed if a mere 6 or 7% of the resource area is recommended for wilderness. Indeed, future generations would benefit. In Nevada, as in other areas of the West, certain vested interests have repeated, over and over again, this falsehood that wilderness excludes the public. It is a favorite trick of the Russians....i.e., tell a lie repeatedly and hope the public is gullible enough to believe it. The BLM, on the other hand, cannot irresponsibly attempt to compare apples with oranges. The wildland values of this state are not like those of Utah or Colorado. or any other state or region. Indeed, the California U.S. court has ruled that wilderness must be considered by site-specific methods and take into consideration evidentiary public input.

Respectfully submitted.

Charles S. Watson Jr.

Charles S. Watson. Jr.
Director

Attachments: see May 17, 1967 letter(3 pages)
see July 7, 1983 Edwin L. Harper(White House) letter
see July 18, 1983 USDI Sec. Watt letter.

Comment Letter 12

ATTACHMENT

THE WHITE HOUSE

WASHINGTON

July 7, 1983

Honorable James Watt
Secretary of the Interior
Washington, D.C. 20240

Dear Secretary Watt:

I am writing to clarify the role of the Property Review Board as it relates to the disposal of public lands by the Department of the Interior. In Executive Order 12348 the President directed the Board to develop and review policies of federal agencies as they relate to the management of real property. In this regard, the Board has consulted with the Department of the Interior to determine the Department's current land management policies and to give the Department guidance as to where those policies could be adjusted to make them consistent with the provisions and the philosophy of the Executive Order. The Executive Order did not intend nor has the Board presumed for the Board to become involved in the operational functioning of the agency in regard to the management of the public lands.

The Board has not requested that you consult with it in regard to transactions where land is sold for fair market value. We are interested in the Department's sales program in order to monitor the progress being made in the disposal process, but it is not our intent to in any way inhibit the statutory authority granted you to sell BLM lands. It would be helpful if the Department of the Interior provided the Board monthly with a summary of the previous month's sales activity.

I trust that this letter will clarify any confusion that may have existed concerning the Board's role in the Department of the Interior's disposal process.

Sincerely,

Edwin L. Harper
Chairman, Property Review Board

ATTACHMENT

THE SECRETARY OF THE INTERIOR
WASHINGTON

July 18, 1983

MEMORANDUM TO WESTERN GOVERNORS

From: Secretary of the Interior

Subject: Good Neighbor Policy

I was particularly pleased with the opportunity to share with you the tremendous successes we have had in the last two and a half years. I felt your questions, both in private and public, dramatized the real progress that has been made. The questions that were not asked were more revealing than the questions that were. As I reflect back over the several meetings we have had in the past and compare them to the Montana meeting, I am delighted with the progress that has been made. That is not to suggest, however, that more progress does not yet remain to be realized.

One of the areas that continues to draw criticism deals with the disposal of lands no longer needed by the Federal Government. I am satisfied that the mistakes of 1982 are not being, and will not be, repeated. Each Governor has been briefed, or his staff has been briefed, on our plans for disposing of the few isolated tracts in the respective states. Several of you did suggest that we needed to reduce the involvement of the Property Review Board of the White House in the Department of the Interior activities. I assured you that as a practical matter they were not involved, but I would seek to formalize that relationship.

Upon returning to Washington, I have secured from the Chairman of the Property Review Board a letter that clearly states that the Board was not to "become involved in the operational functioning of the agency (Interior) in regard to the management of the public lands." I am attaching a copy of that letter just so that there can be no doubt. I am satisfied, based on the private conversations and the public dialogue, that there is no room for criticism of this program as it relates to future activities. Criticism of the past is for the most part justified.

I look forward to improving relationships and thank you for helping us to be as successful as we have been.

If you have any concerns or questions, please call. The rule continues to be that if I don't hear from you, things are going well.

Comment Letter 12

ATTACHMENT

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

IN REPLY REFER TO
6101.7 (712e)

May 17, 1967

Mr. Charles S. Watson, Jr.
P. O. Box 6601, Lemay Branch
6197a Lemay Ferry Road
St. Louis, Missouri 63125

Dear Mr. Watson:

Thank you for your letter of May 10, 1967 and the attached correspondence from Mr. Baker to Dr. Lyon, dated April 27, and Mr. Baker's letter to you on the same date.

You have raised several questions in your letter that I will try to answer as best I know how:

1. "It would appear that his letter to Dr. Lyon indicates Mr. Baker knows nothing at all about the 'task force' on recreation you discussed with George Kell and I early last year. I had understood that during your trip to Nevada, at that time, you discussed this with Mr. Baker and Mr. Kell. As I recall it was agreed 'NORA' Inc. would be made a part of this 'task force on recreation'."

   Answer:
   My one and only trip to Reno, Nevada in connection with the N.O.R.A. program was when Mr. Penny was State Director. Mr. Kell was at that time Assistant State Director of California. A meeting was held by me with Mr. Kell of N.O.R.A., Mr. Penny and Mr. Baker at that time. As I recall, our general discussion with Mr. Kell centered around a "joint effort" on the part of N.O.R.A., BLM and other agencies, to identify, study, exchange information, and assess outstanding scenic, natural, historic and outdoor recreation opportunities on BLM lands in Nevada. In my phone conversation yesterday with Mr. Baker, he stated that he recalled no specific reference to the establishment of a task force during this meeting. I believe this to be understandable in that our discussion was general and was mostly focused on joint efforts in the exchange of information and how N.O.R.A. and BLM could best accomplish this. As I recall, no reference was made toward establishment of a working group, membership of group or assigned responsibilities normally considered the formation of a task force. I am assuming that you have somewhat the same viewpoint of what constitutes a task force.

ATTACHMENT

It was my view during that meeting and subsequent meetings with you, that joint efforts are necessary between your organization and ours (and other agencies) to be sure that all the outdoor recreation opportunities on BLM lands in Nevada are identified and that we move as rapidly as we can to preserve and protect them within the limitation of funds and manpower.

It was not my intention to establish a task force on recreation for Nevada with specific membership, specific duties and specific responsibilities, but rather your group and ours work together jointly to freely exchange information and receive the benefit of individual knowledge, expertise and experience. I recall stating to you that joint effort could best be accomplished by identified individuals of your organization and ours studying together the opportunities in Nevada. This is what I envisioned we would do, both here and at the field level. Whether I called it "task force" or "joint effort" I truthfully don't recall. Nevertheless, it still is my view that we should continue to objectively analyze together, cooperatively, the Nevada recreation resources - endeavoring to find ways to preserve and protect them. You are, and have been the spokesman for N.O.R.A. and I have sought to the best of my ability to discuss with you the various problems in order that you can participate jointly in our effort; I will continue to do this. I do not, however, feel that this effort requires a formal working group with an established membership and responsibilities.

2. "I would also appreciate an explanation of what Mr. Baker means by his claim that N.O.R.A.'s survey had been considered. . . ."

Answer:
It would be my thinking that Mr. Baker is referring to actions taken both at the Washington level and Nevada level in connection with the N.O.R.A. survey.

A good deal of time has been spent at both levels in comparisons of inventory information, analysis of significant areas, and, being sure that all possible opportunities are identified. This includes microfilming the N.O.R.A. survey at the State Office, and providing the respective District offices with all this information. Each District office in its development of plans for protection, preservation and development is giving and will give full consideration to N.O.R.A.'s inventory along with BLM's to be sure that no opportunities are missed. To my knowledge your inventory and assessment of significant areas is a very basic part of our inventory, and that through the exchange of information between N.O.R.A. and BLM, both of us have a pretty good picture.

Comment Letter 12

ATTACHMENT

I have always enjoyed our discussions over the many hours we have spent analyzing inventories and problems of protection of the Nevada recreation resources. I hope you will continue to give me your viewpoints and comments as they occur to you.

Sincerely yours,

Eldon F. Holmes
Chief, Recreation Staff

801.6b(4)

MEMO

TO John Richardson

FROM Wayne Perock

DATE 12/06/83

SUBJECT Lahontan Wilderness Technical Report

DIVISION OF STATE PARKS

The proposed action does not adversely impact State Parks or it's programs.

The document is a supplement to the Lahontan Resource Management Plan. It provides a more detailed evaluation of the wilderness criteria summarized in the R.M.P.

Four Wilderness Study Areas are addressed:

Clan Alpine Mountains	-	196,128 acres
Stillwater Range	-	94,607 acres
Desatoya Mountains	-	51,262 acres
Job Peak	-	91,209 acres
Total		433,206 acres

Designation of all or a portion of the W.A.S.'s would enhance primative recreation opportunities while reducing potential for O.R.V. related activities.

Primative recreation opportunities listed include: hiking/backpacking, sightseeing, nature study, bird watching, photography, camping, picnicking, rock hounding, vegetation collecting, hunting, trapping, rock climbing and horseback riding.

Designation would be consistant with S.C.O.R.P. in that it would "preserve a representative cross section of Nevada's roadless, undeveloped areas in wilderness". It also is consistant in promoting dispersed recreation.

While all four areas have wilderness characters in varying degrees, I recommend we support wilderness designation in the following priority.

- Desatoya Mountains shows excellent wilderness qualities and extensive recreation opportunities. Conflicts with other interest are minimal--strongly recommend designation.

- Clan Alpine - While wilderness quality and recreation opportunities are good, a high number of conflicts with mining claims, roads etc. exist. Recreation interest may be best served through existing multiple use.

a division of the Department of Conservation and Natural Resources

Comment Letter 13

- Stillwater Range offers limited recreational opportunities and conflicts with other interest are high.

- Job Peak has limited opportunities and many conflicts exist.

Designation of any or part of the W.S.A.'s would benefit tourism because this would bring broader public awareness of the areas.

We should support the proposal especially the designation of the Desatoya Mountains.

WRP/se

December 19, 1983

Tom Owen
BLM District Manager
1050 E. Williams St.
Carson City, Nevada 89701

Dear Sir:

Last spring I had the good fortune of walking in the Desatoya Mountains for two days. Visiting the Desatoyas reinforced my belief that Americans today are truly fortunate in still being able to experience unscared, unlittered areas much as our forefathers did. With our good fortune though, I feel is an obligation to protect these areas for future generations.

I support all the recommended wilderness areas in your district. I only regret that so many other of Nevada's beautiful areas have been spoiled by the careless, thoughtless few who rape our public lands.

Let us protect these few remaining unspoiles areas by designating them wilderness areas.

With best regards,

Brent Boyer

Brent Boyer
P.O. Box 414
Reno, Nevada 89504

Comment Letter 15

United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION

450 GOLDEN GATE AVENUE, BOX 36063

SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

L7619 (WR-RPE)

December 8, 1983

Memorandum

To: District Manager, Bureau of Land Management, Carson City, Nevada

From: ACTING Regional Director, Western Region

Subject: Draft Lahontan Resource Management Plan and Environmental Impact Statement (DES 83/66)

In response to your request, we have reviewed the subject document and have the following comments to offer.

Chapter 2 - Alternatives

15-1 Although this chapter does provide an important reference to the treatment of cultural resources on pages 2-19(2), diacussions regarding cultural resources, their protection, and potential impacts throughout the rest of the report are weak. For example, the Chapter 5 - List of Preparers does not indicate archeological input despite the fact the Carson City Bureau of Land Management District Office has at least one archeologist. Also, the Alternatives section does not adequately discuss the implications for cultural resources (degree of protection afforded per alternative, potential adverse impacts per alternative, etc.). These implications will vary somewhat depending on which alternative is chosen.

Chapter 4 - Environmental Consequences

15-2 On pages 4-5, under Cultural Resources, the statement indicates that "Continuing to manage public lands at the present levels would have little impact on the cultural resources program, because they are protected from any authorized activities that may occur on public lands". How are they protected? This should be explained.

15-3 On pages 4-30, under Cultural Resources, how will creating a wilderness also automatically confer protection for cultural resources? Also, the paragraph discussing disposal of 116,500 acres of public lands is confusing and contradictory. If a cultural resource clearance is completed prior to disposal, how and why would sites be lost through disposal? In addition, how and what type of mitigation plan would be developed?

On pages 4-41, under Cultural Resources, paragraph 2, appears the statement "Although mitigation may be developed in the short term for any sites found on

Response Letter 15

15-1 Discussions regarding cultural resources, their protection and potential impacts is necessarily limited in the RMP since cultural resources is not an issue. Potential impacts to cultural resources from selection of any of the alternatives is minor.

Archaeological input to the RMP was provided by Lahontan Resource Area Recreation Planner Chuck Otto who is a BLM Designated Archaeological Technician (DAT). This input was reviewed by Carson City District Archaeologist Brian Hatoff.

15-2 Cultural Resources are protected from unauthorized activities by Section 106 of the National Historic Preservation Act of 1966 and section 101(b)(4) of NEPA of 1969 as outlined in Standard Operating Procedure #2 on page 2-16 of the Draft RMP.

15-3 Wilderness designation will protect cultural resources preserving them in their natural state. Surface disturbing activities would be prohibited. Easy vehicular access, which is commonly associated with vandalism and pothunting, would be denied.

A cultural resource clearance would probably require that any sites located of National Register eligible quality would either be subjected to a data recovery program approved by the SHPO and Advisory Council, or preserved *in situ* in those instances where other forms of mitigation would not be acceptable. By definition, data recovery in most instances means a site will be partially or completely destroyed.

Comment Letter 15

2

15-4 land for sale, cultural resources are a non-renewable resource." This statement does not make sense. Also, in paragraph 3, the reference should read "Chapter 2, pagea 2-16(2)."

We appreciate the opportunity to review this plan and statement.

W. Russell Shito

Response Letter 15

A mitigation plan would be developed on a case by case basis depending on the needs of each individual site found.

15-4 Please refer to the errata section of this document.

Comment Letter 16

Lahontan Audubon Society, Inc.
Post Office Box 2304
Reno, Nevada 89505
(702) 329-8766

December 22, 1983

Thomas J. Owen, Dietrict Manager
BLM Carson City Dietrict
1050 East Williams Street, Suite 335
Carson City, NV 89701

Re: Lahontan RMP Wildernese

Dear Mr. Owen:

The Lahontan Audubon Society endorses the concept of Wildernese for portione of Nevada. We feel that your procese has identified those arese that meet the legal requirements and special featurese required for wildernese in Nevada.

We endorse the objectives and wildernese recommendatione of the Mid-Range Alternative as a balance between protection of natural valuee and production of commercial resources. This elternative would improve the condition of the public rangelands, so as to enhance productivity for all rangeland valuee; would maintain and improve wildlife habitat, especially riparian habitat; would manage for adequate wild horses at their present levels; and would recommend wilderness for the areas with the highest valuee, low resource conflicts and with manageable boundriee.

Sincerely

Janet C. Meierdierck

Janet C. Meierdierck
President, Lahontan Audubon Society

Comment Letter 17

RICHARD H. BRYAN
Governor

STATE OF NEVADA

DEPARTMENT OF MINERALS
400 W. King Street, Suite 100
Carson City, Nevada 89710
(702) 885-5050

December 7, 1983

Mr. Thomas J. Owen, District Manager
Bureau of Land Management
1050 East Williams St., Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

The Nevada Department of Minerals appreciates the opportunity to review and comment on the Draft Lahontan Resource Management Plan and Environmental Impact Statement (SAI NV#843DD027). Our agency is particularly interested in issues associated with minerals and energy development, since related decisions could have long lasting effects on the mineral industry in the State.

The Nevada Department of Minerals has several concerns relating to the Lahontan Resource Management Plan and Environmental Impact Statement. Of primary concern is the proposal to close several sections of land in which there currently is or has been mining or exploration activity. Many of these areas also have favorable potential for geothermal development and include sections of lands currently under oil and gas leases. The
17-1 department is also concerned about the designated mineral potential as stated in the draft document. We feel that the rating system to evaluate mineral potential is inaccurate and biased since a high rating only recognizes past mineral activities. We believe that an area's true mineral potential can never be fully known until actual mining and exploration occurs. In many cases, major mineral deposits are overlooked or ignored until new technological breakthroughs or shifts in industrial needs suddenly transform an area which seems to have little or no mineral potential into a prime exploration target.

The Department recommends that wilderness study areas should only be considered if an area has no mineral resource potential; that is, areas with sufficient geologic data to indicate the lack of favorable host rocks or mineral resources given today's mining technology and, of course, present and predicted economic conditions.

Response Letter 17

17-1 A high rating under the GEM Classification Scheme may be based on the geologic environment and inferred geologic processes, as well as reported mineral occurrences and known mines and deposits.

The certainty or uncertainty of these ratings is quantified in the GEM confidence scheme. The GEM mineral potential ratings reflect current knowledge of an area, but also anticipate future technology and discoveries. Follow-up work by U.S.G.S. and the Bureau of Mines will refine and enhance the findings.

Furthermore, the department feels that if any area with favorable mineral potential is to be recommended for wilderness, it should only be because: 1) There are no alternate sites with no mineral potential, or 2) An intensive U. S. Geologic Survey or U. S. Bureau of Mines study has been conducted at a sufficient level of detail to reclassify the area as having no resources potential.

Generally, the department found the draft document to be well written and easy to understand. Your staff should be complimented on their efforts concerning both data collection and compilation.

For clarification purposes, please find listed below our specific comments on each of the four Wilderness Study Areas identified in the Lahontan Resource Area.

Clan Alpine Mountains-The Nevada Department of Minerals strongly recommends that the entire area not be considered for wilderness due primarily to the mineral potential and consequent resource conflicts which exist in the area. The Clan Alpine is currently and has in the past been of extreme interest to the mineral industry. The tremendous number of mining claims in the area along with historic mining activities and recorded production attest to the fact that the Clan Alpine Mountains should remain available for exploration and mineral production. The large block of claims in the northern section of the WSA are in an area of proven gold, mercury, and antimony deposits. The large block of mining claims on the eastern edge of the WSA is in an area of proven tungsten deposits. The mining claim block in the southern sections are in an area of proven gold deposits. The department feels that the gold deposits in the southern portion of the WSA could possibly extend far into the sections identified in the preferred alternatives. The Department feels that all alternatives, except no wilderness, would have a significant adverse impact on mineral and energy development in the area.

Stillwater Range-The Nevada Department of Minerals supports the preferred alternative for this Wilderness Study Area.

Desatoya-The moderate geothermal and mineral potential on both the northern and southern sections of the WSA along with present and historic gold mining activities in the Carroll Summit Area present resource conflicts that the Department feels outweigh the wilderness value in the area. Therefore, the Nevada Department of Minerals recommends that the entire area not be considered for wilderness, since all alternatives, except no wilderness, would have a significant adverse impact on mineral and energy development in the area.

Job Peak-The Nevada Department of Minerals supports the preferred alternative for this Wilderness Study Area.

Comment Letter 17

As a closing statement, the Department of Minerals does value preserving some public lands for future generations and scientific study, as long as the mineral industry, which is so essential to our national defense and the State's progressive economy, can remain healthy and be provided the opportunity to pursue new mineral resources.

Sincerely,

Paul Iverson
Deputy Director

PI/kc

cc: Edward F. Spang, State Director
Linda Ryan, Office of Community Services, State Clearinghouse Program

Comment Letter 18

ECOLOGY CENTER OF SOUTHERN CALIFORNIA

(213) 559-2100

December 19, 1983

Mr. Thomas J. Owen
Carson City District Manager
U.S. Bureau of Land Management
1050 E. William St., Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

While most of the members of the Ecology Center of Southern California are from the greater Los Angeles area, we do have members throughout the country who are concerned about our public lands. And as recreationalists, members do travel to federal lands in both the California as well as the Nevada desert, especially because of the ecological similiarities and proximity. Consequently, we would like to comment on your plans for the Lahontan Resource Area.

Without a doubt, more lands are need in the wilderness designation category. The Ecology Center urges you to consider wilderness recommendations in all of your Wilderness Study Areas(WSA) and to list more Areas of Critical Environmental Concern (ACEC).

18-1 While your district has designated 3 ACECs, why have you failed to include these significant ACECs?:

- Grimes Point--an archeological site with petroglyphs intricately carved on basaltic rocks
- Graves Cliffs and Caves--suspected Anasazi (Fremont) people activity site from c. 5000 B.C.
- Carson Sink Sloughs--desert marshes with abundant wildlife
- Singing Sand Mountain--major dune area with rare endemic invertebrates (Aegialia sp. and Cardiophorus species) and kit fox dens
- Dixie Valley 1954 Earthquake Zone--major scientific and geological interpretive zone; features of the 1954 earthquake rift
- Wonder Ghost Town--remains of 1906 gold rush showing historic buildings, sedimentary formations and possibly a fossil deposit
- Kaleidoscopic View--vista of entire Lake Lahontan ancient lakebed
- Lahontan East Petroglyphs--a zone of petroglyph-clad monoliths
- Soda Lake--a geological area highlighted by a huge sinkhole containing a large briny lake; has portions of the California Trail with possible artifacts along the way

18-2 As our organization comments on wilderness proposals by Bureau of Land Management Districts throughout our areas of interest, we believe that bad precedents should not be established. From the sound of your recommendations it would be a terrible precedent to include "no wilderness" suggestion in "Preferred Alternatives" and have recommended wildereness only in "Commodity Production Alternatives". How can this be justified?

Response Letter 18

18-1 Refer to response 12-3.

18-2 Refer to response 12-5.

Comment Letter 18

ECOLOGY CENTER OF SOUTHERN CALIFORNIA LETTER--page 2

Please reconsider the following Wilderness Study Areas and include some of the following recommendations:

Mid-Range Alternative--Add more than 11,500 to BLM's 37,000 for a total of 48,500 acres. Job Pead at 8,785 and highest in the Stillwater Range needs protection along with its canyons Box, Little Box and East Lee Canyons which are all notably scenic. Habitat would also be protected for golden eagle raptors and great horned owls. There is no reason that a grazing permittee should have the government upgrade his access to a road and thus disqualify much of this WSA or be allowed to do the work himself. The public's public land should be maintained with as few such changes as necessary so that proper planning and designation can proceed.

Desatoya Mountains WSA (NV-030-110)--The BLM Preferred Alternative of 43,045 seems to protect most of Big Den Canyon with other canyons and waterfalls. This area which has riparian habitat and alpine vegetation plus scenic canyons deserves full protection.

Stillwater Range WSA (NV-030-104)--Both Misaissippi and Hare Canyons dominate this lovely rugged area which is habitat for deer, golden eagles, and unusual flora. Would protect some of the 1954 Dixie Valley EArthquake Fault along with hidden coves and primitive side canyons if 40,000 acres are saved.

Clan Alpine Mountains WSA (NV-030-102)--Again Canyons (Bench, Byers, Dyer, Horse and Florence Creek) dominate an area which provides watershed and riparian values. The mountain mahogany could provide excellent scientific research opportunities. This Mid-Range Alternative should have 158,504 acres of wilderness not just 68,458 acres.

The Ecology Center of Southern California members look forward to your agency keeping us informed about your wilderness and other land use planning issues in your district. We appreciate our comments being included in the official hearing record.

Sincerely yours,

Nancy Sue Pearlman
Executive Director

NSP:ez

Comment Letter 19

Dec. 20, 1989

Mr. Tom Owen
District Manager, Carson City District
Bureau of Land Management
1050 E. Williams St., Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

I have just finished reviewing the Draft Lahontan Resource Management Plan and EIS and would like to state my preference for the Resource Protection Alternative. I think this alternative is much closer to fair multiple use than the Preferred Alternative, which gives too much consideration to exploitative interests and too little to the public's interest at large in seeing other values preserved.

Although I think you could have allowed for a greater increase in wild horse herd numbers, allowing these herds to remain at current levels was certainly much better than cutting them back even more drastically than you have already done and further frustrating their attempts to come to terms with their environment. Although I believe you will find that holding them to this artificially low level is also a frustration of the wild horses' attempts to fill its empty niche on the lands of the Lahontan Resource Area.

In the Preferred Alternative, I was upset that the livestock usage would remain high (64,239 AUM's). I don't think you can realistically keep it at this level and expect the range to recover. I was also very upset to see that far too little wilderness is being designated --only 26% of that proposed, or 111,554 acres. Since Nevada is a relatively unproductive state where solitude seems inherent, I believe the four Wilderness Areas should be designated in their entirety, as stated in the Resource Protection Alternative. Time has a way of erasing any disturbances, or at least making them acceptable, so that, with adequate protection, these WSU's would regain their wild, natural qualities.

I would prefer seeing 53 miles of stream receiving protection in order to build up vital wildlife habitat for game and non-game species alike, but 30 miles is certainly a positive action.

I hope that you will redo this Plan in order to incorporate more of the decisions as presented in the Resource Protection Alternative. This would be much fairer to all the U.S. public and far wiser land stewardship in the long term.

Sincerely,

Craig C. Downer, M.S.
P.O. Box 456
Minden, Nevada 89423

Division of State Lands
State Land Agent
State Land Use Planning Agency
(702) 885-4161

Address Reply to
Division of State Lands
201 S. Fall Street
Capitol Complex
Carson City, Nevada 89710

STATE OF NEVADA

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

Division of State Lands

December 20, 1983

Thomas J. Owen, District Manager
BLM Carson City District
1050 East William Street, Suite 335
Carson City, Nevada 89701

SUBJECT: Comments on Draft Lahonton Resource Management Plan and Environmental Impact Statement

Dear Mr. Owen:

We have reviewed the Draft Lahonton Resource Management Plan and Environmental Impact Statement and attended all the public hearings held in regard to the Plan and EIS. We offer the following comments:

20-1 1. The three year average licensed use of 84,239 AUM's for livestock grazing levels in the preferred alternative is lower than the 81,840 AUM active grazing preference for the area. Use of the three year average licensed use is, in most cases, an appropriate starting point on which to monitor to determine trend and condition. For most operators this should not create any significant problems. We are, however, concerned about those livestock operators whose three year average use is lower than a reasonable stocking rate for their allotment. These reduced numbers may have occurred for a variety of reasons, some not related to forage conditions. We would recommend that the three year licensed use be used as a general guide in establishing stocking rates on which monitoring will be based. For those livestock operators who have been running less livestock in the past three years for reasons unrelated to forage availability, we suggest that the BLM work with this limited number of operators to establish a stocking level which would be more equitable. This would avoid unfairly penalizing a few operators who happened to have had herd levels less than they reasonably could have had during the past three years. We recognize that a proper monitoring program should allow for upward adjustments for these operators; however, these adjustments under the process proposed, will not be implemented until after monitoring is well underway. This will still unfairly penalize some of the operators who have reduced herd levels.

The actual implementation of fair stocking rates to be used for monitoring could be established through a coordinated resource management planning process, if all participants are agreeable to using the process.

Selection of the Commodity Production Alternative for livestock grazing would avoid this problem.

20-1 Please refer to page 2-1 which states that there would be no initial adjustment in active preference. This means that permittees would continue to be able to stock their allotments up to the present active preference level—they would not be held to the three year average use level. This level was used in the RMP to provide a standardized base from which to analyze the impacts of the various alternatives and because there is no reason to expect major initial changes in the licensed use level if the preferred alternative is implemented.

Comment Letter 20

Thomas J. Owen, District Manager
December 20, 1983
Page 2

20-2 2. We question how the environmental consequence for wild horses under the preferred and midrange alternatives could be stated as ". . . no change to wild horse population levels." This statement does not analyze positive or negative impacts. Since there are so many who feel that wild horse numbers are too high and that range resources are being damaged, a "middle-of-the-road" alternative would probably more accurately call for protection of herds at "viable" sizes and reduction to those sizes or the 1971 levels. The environmental consequence of maintaining high wild horse populations should at least be stated correctly under both the midrange and preferred alternatives.

3. For wilderness study areas included in the resource area, we offer the following evaluations and recommendations:

A. **Stillwater Range** (NV-030-104): We agree that the area should not be considered further as a potential wilderness area. High mineral values and limited wilderness characteristics should have disqualified this area before now.

B. **Clan Alpine** (NV-030-021): The majority of the area has high resource values, evidence of mining activity, roads and ways. Military overflights adversely affect wilderness considerations. These values and the impacts of man seem to outweigh the limited areas which may contain wilderness values. We recommend the area be dropped from further wilderness consideration.

C. **Desatoya** (NV-030-110): This area has wilderness values which are not already adversely impacted by the imprints of man. Also, resource conflicts appear to be minimal. This area should continue to be considered as a potential wilderness area. A small area near Carroll Summit (portions of Sections 7 and 8, Township 16 North, Range 38 East), where historic mining activities have occurred, should be excluded from the wilderness proposal. This will eliminate the most significant resource conflict noted for the area.

D. **Job Peak** (NV-030-127): This is an area having high mineral and geothermal potential. The limited wilderness characteristics of the area are substantially diminished by the resource values present and the many military overflights occurring in the vicinity. We agree that the area should not be further considered for wilderness designation.

Thank you for the opportunity to participate in the planning for the Lahontan Resource Area. We hope our comments are useful to you.

Sincerely,

Pamela B. Wilcox
Administrator

PBW:JMD:js

Response Letter 20

20-2 The impact to wild horse population levels from the mid-range alternative is no initial change. The impact of maintaining current population levels of wild horses and livestock to vegetation is indicated in the vegetation section on pages 4-25, 4-26 and 4-28.

Comment Letter 21

Eileen and Darwin Lambert
423 Route 2
Luray, Virginia 22835

Thomas J. Owen, District Manager
Bureau of Land Management
U.S. Dept. of the Interior
1050 East William St.
Carson City, Nevada 89701

December 26, 1983

Lahontan Planning

Dear Mr. Owen:

We like your recommendation for wilderness in the remarkably scenic Desatoya Mountains (110/228) between what we think of as the two "routes" of Highway 50 west of Austin--but go on record urging substantial changes in other aspects of your Lahontan resource and environmental planning recently disclosed.

BLM information, as you know, showed 193,120 acres in the Clan Alpine Range (102) with outstanding opportunities for solitude and for primitive and unconfined recreation. These mountains and canyons are esthetically pleasing, have much cover including pinyons, aspens, mountain mahogany, also wildlife, water, and other appropriate characteristics. We think at least 80% of the acreage should be kept as wilderness.

Similarly, you found outstanding wilderness in the Stillwater Range (104) and, we think, should recommend 40,000 acres or more, including historic places and geologic phenomena such as the unusual earthquake slippage that we remember vividly since the 1950s. In this same range your Job Peak area (127), with water, wildlife and splendid canyons, where you found at least 91,022 acres outstanding for wilderness values, should in our opinion be represented by a minimum of 50,000 acres.

21-1 We're also concerned about features which, though not "wilderness," surely deserve recognition and protection. One of our favorites has always been Sand Mountain. We've walked on and around it on many occasions and photographed it. We consider it an "artistic" masterpiece and know it's also of scientific interest. While parts might be used by off-road vehicles, we personally feel a substantial portion should be protected in as natural a condition as possible. Special plants --surprisingly!--grow there, and the use by wild creatures is intriguing. We've enjoyed finding their tracks. We're far from alone in wanting opportunity for study and quiet enjoyment of this great dune, which is outstanding not just in Nevada or in the U.S. but in world perspective.

We're also concerned about petroglyphs, and other archeological remains, in such places as Grimes Point and Graves Cliffs and about the historic remains at the old gold town of Wonder. We're similarly worried about other points of historic, biologic, geologic, archeologic, scenic, or other special interest that we're sure you're aware of. Some of these, at least, should be designated fittingly so as not to

Response Letter 21

21-1 Please refer to response 12-3.

be letsr mourned--among other considsretions--es lost unnecessarily.

Further--though we've been involved with, and continue keenly interested in, community development, grazing, prospecting and mining on lands held by BLM in Nevede--and don't want federel ections or leck of ections to hamper these important metters unduly--we fesl scientific-recreetional-esthetic interests ere equelly deserving. We urge you to evoid offering lerge trects for sale when the greed of speculators for weelth is the primary push. Please givs fresh and cereful thought to vest tracts--such as neer Fernley end Gabbs--that somehow heve gotten in line for dispoeal. Pleese consider what ths citizsnry of the United Stetes would lose, or gain, if such sales went through.

Pleess elso let your better judgment continue to preveil over unreelistic notions of would-be or uninformed prospectors that workable deposits of velueble minerels lurk still-undiscovered under almost evsry sagebrush, ealtbush, aspen or pinyon. It's natural, of course, for humans to "dream" but good judgment must be based on known fects.

We'll be grateful for your careful considsretion of this lstter. The long-renge futurs of the arees involved is important not just to Nevede end to the BLM but most of all to our whols nation.

Sincerely,

Eileen Lambert Darwin Lambert

Eileen and Darwin Lambert

Comment Letter 22

— LAHONTAN —

22-1 The undersigned are totally opposed to ANY form of Wilderness designation to be made by the BLM within the Lahontan District of Western Nevada.

We appreciate any and all help you can give on our behalf before December 30, 1983.

		Address
1	S.W. Story	3295 S. Virginia St. #306, Reno, NV 89502
2	[illegible]	[illegible] 89570
3	Kandi Cervenka	106 Keystone Reno 89503
4	H. CERVEAUX	1583 So Virginia Reno 89503
5	M. Cerveaux	1583 So Virginia Reno 89503
6	Iquina Lowery	3165 Douglas Sparks 89431
7	[illegible]	3165 [illegible] Sparks NV 89431
8	[illegible]	930 Angelique Rd. Reno, NV 89506
9	Ollie Douglas	4800 Stately Rd.
10	Leon R. Gallagher	636 Bumbley Ave Reno, Nev. 89509
11	Mark A. Lemmon	P.O. Box 1344 SPARKS, NEV. 89432
12	Elizabeth Rhodes	1945-4th St Sparks NV 89431
13	Paul Shelp	4604 Neil Rd Reno, NV 89502
14	Marlyn Shelp	4604 Neil Rd. Reno NV 89502
15	Paul Shelp	4360 Rio Rico Rd Reno, NV
16	Lucy Stancerf	7524 Bluestone Dr Reno NV 89511
17	Jackie M Arnold	7524 Bluestone Dr RENO NV 89511
18	Angie Aylin	1662 Orbury Ave. Reno NV 89509
19	Glynn Harrold	P.O. Box 388 Eureka, Nev 89316
20	James B. Stoppert	7830 N. Virginia St #16 RENO, NEV 89506
21	Katherine Cotter	P.O. Box 1178 Reno, NV 89505
22	Victor E. Hester, III	100 N Arlington Reno NV 89501
23	Robert E. Stitt	1820 Sunbeam Dr Sparks NV 89431
24	Eldice Stoffer	1820 Sunbeam Dr Sparks NV 89431
25	Colleen J. Simon	1152 Andes St, Reno, NV 89506
26	Clifton M. Simon	1152 Andes St Reno NV 89506
27	William O. Birchall	2565 Meadowlark Dr. RENO, NV 89506

COPIES TO: B. UCCAMOVICH
P. LAXALT
C. HECHT
BLM

Response Letter 22

22-1 This petition has a total of seven pages and 157 signatures. Due to the prohibitive cost of printing, the entire petition has not been reproduced in this document. Although the number of signatures on a petition does not necessarily give it more weight in the planning process, this petition has been considered in the development of the proposed Resource Management Plan in this document.

Comment Letter 23

District Manager
Carson City District, B.L.M.

Dear Sir:

The following are my comments considering your recommendations for wilderness in the Lahontan Resource Area.

Your current recommendations are totally inadequate in light of the high wilderness values within the resource area.

In this view, I recommend the following:

1) Clan Alpines --- One of the largest W.S.A.s in Nevada; this expansive and scenic area is an important watershed and wildlife resource. I recommend that the entire area of 196,128 acres be proposed for wilderness. At the very least you should recommend the "Mid-Range Alt." proposal of 150,500 acres.

2) Desatoya Range --- this spectacular range is an outstanding candidate for wilderness status. It's wildlife, rugged canyons, and scenic splendor deserve full protection. I recommend that all 51,622 acres be recommended for wilderness. I compliment you on your "preferred alternative" recommendation, however, that 43,045 acre proposal is not large enough.

3) Job's Peak --- I'm very disappointed by your failure to recommend this area for wilderness. There are very high recreation and wildlife values in the area. I recommend that the entire 90,209 acre be proposed for wilderness.

4) Stillwater -- Again, it is unfortunate that you did not propose at least part of the area for wilderness. This rugged area deserves a wilderness recommendation for the entire 94,607 acre area.

Thank you for this opportunity to comment,

Bert Koehler
Consultant for
Nevada Wilderness Assoc.

Comment Letter 24

Sierra Pacific Power Company

December 20, 1983

RETURN RECEIPT REQUESTED

Mr. Thomas J. Owen, Manager
Carson City District
Bureau of Land Management
1050 East William St., Suite 335
Carson City, Nevada 89701

Re: BLM Carson City District - Draft Lahontan Resource Management Plan and Environmental Impact Statement

Dear Mr. Owen:

As the "Transportation and Utility Corridor" issue has not been addressed, Sierra Pacific Power Company finds the Draft Lahontan RMP and EIS to be incomplete and unacceptable. We urge you to include this vital planning consideration in the Resource Management Plan for the Lahontan Resource Area.

"Transportation and Utility Corridor" planning has been directed by Congress, through the Federal Land Policy and Management Act of 1976, § 503, and subsequently addressed in 43 CFR 2800, the BLM Manual, and BLM Bureau-wide Instruction Memoranda. In practice, the "Transportation and Utility Corridor" issue has been incorporated in the BLM California Desert Conservation Area Plan and proposed in the BLM Wells Resource Area Draft RMP, BLM Egan Resource Area Draft RMP, BLM Shoshone-Eureka Resource Area Draft RMP and most recently, as a result of Sierra Pacific's protests, directed by the BLM Nevada State Director to be included in the Paradise-Denio Resource Area MFP-III, Sonoma-Gerlach Resource Area MFP-III and Reno Planning Area MFP-III decisions. The precedent and procedures are now well established to develop a planning program in the Lahontan Resource Area dealing with the transportation and utility corridor issue.

Transportation and utility corridor planning is an important element of the National Energy Policy, Multiple Use Management, and Transportation and Utility Planning by industry. Without appropriate planning for future energy transportation and development, the FLPMA objectives of minimizing environmental impact through land use planning may not be achieved. Some possible ramifications of not achieving these objectives include greater environmental impact and increased energy costs if the national energy policy encouraging domestic energy production is not fulfilled.

Interjurisdictional continuity and management of the corridor issue by Federal Land Management Agencies will provide the Nation's industries with the ability to do long range planning to increase domestic resource development. Major transportation and utility corridors greatly effect these regional planning efforts by industry.

P. O. BOX 10100/RENO, NEVADA 89520/TELEPHONE 702/789-4011

Comment Letter 24

Mr. Thomas J. Owen
December 20, 1983
Page 2

No one transportation or utility corridor user stands as an island, as the interconnections are a key element in their ability to provide reliable and economical service.

Sierra Pacific, as in the past, offered our assistance and resources for corridor planning within the Carson City District's Resource Areas, now in particular, regarding the Lahontan Resource Area Resource Management Plan.

24-1 In conclusion, we find the Draft Lahontan Resource Management Plan and EIS to be an incomplete document which has not complied with multiple use management, the intent of Congress, BLM Manual or Directives. We very strongly recommend that existing, planned and future transportation and utility corridors, along with the necessary map documentation, be included in the Final Lahontan Resource Management Plan and Environmental Impact Statement.

We hope that our concern can be resolved in this land use planning process. We look forward to working with you on this issue. Enclosed is a copy of Sierra Pacific's oral testimony given November 10, 1983.

Sincerely,

Michael P. Sullivan
Manager, Environmental Affairs
and Right-of-Way Acquisition

JLB/SPY/ro

Enclosure

cc: Ed Spang - BLM Director, Nevada
Stu Gearhart - BLM
James Phillips - BLM

Response Letter 24

24-1 In response to this comment, right-of-way corridors have been included as an issue.

STATE OF NEVADA

RICHARD H. BRYAN
Governor

LINDA A. RYAN
Director

STATE OFFICE OF COMMUNITY SERVICES
Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

December 21, 1983

Mr. Tom Owen
District Manager
Carson City BLM District Office
1050 East William Street
Suite 335
Carson City, Nevada 89701

Re: 84300027

Dear Mr. Owen:

The Nevada State Clearinghouse has concluded its review of the Lahontan RMP/EIS. Attached are comments from the Departments of Wildlife, Agriculture, Transportation, Division of Historic Preservation and the Nevada Bureau of Mines. We acknowledge your receipt of comments from the Department of Minerals and the Divisions of Parks and State Lands.

State agencies' comments specific to wilderness issues are being submitted for your consideration only; a State Wilderness consensus position from the Governor on the Lahontan RMP/EIS will be forwarded under separate cover.

I would also like to thank you for letting us review the public hearing transcripts prepared for the BLM; the transcripts are enclosed. If you have any questions or if I may be of further assistance, please call.

Sincerely,

John B. Walker
Clearinghouse Coordinator

JBW/kf

Comment Letter 25

STATE BOARD OF AGRICULTURE
JOHN H. HALTZ, CHAIRMAN
STEPHEN H. BOUGOU
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RICHARD H. BRYAN
GOVERNOR

NOV 1983

THOMAS W. BALLOW, EXECUTIVE DIRECTOR
JAGER ARMSTRONG, D.V.M., DIRECTOR
DIVISION OF ANIMAL INDUSTRY
PHILIP C. MARTINELLI, DIRECTOR
DIVISION OF PLANT INDUSTRY
STEPHEN J. MAHONEY, DIRECTOR
DIVISION OF BRAND INSPECTION

STATE OF NEVADA
DEPARTMENT OF AGRICULTURE
350 CAPITOL HILL AVENUE, RENO, NEVADA 89502
MAILING ADDRESS: P.O. BOX 11100, RENO, NEVADA 89510-1100
TELEPHONE (702) 789-0180

MEMORANDUM

Office of Community Services
1100 East William, Suite 109
Carson City, Nevada 89710

November 1, 1983

SAI NV # 84300027 - Lahontan RMP/EIS and Lahontan Wilderness Technical Report
Comments Due: 12/19/83

Livestock: The Preferred Alternative is recommended.

Wild Horses: Reduce numbers to 1971 levels or use Commodity Production Alternative.

Wilderness: Recommend the No Action Alternative.

Clan Alpine Mountains have substantial human imprints, including 39 miles of ways, 3 pipelines, one reservoir and 13 developed springs. The area also contains high mineral content.

Stillwater Range contains 27.5 miles of roads and 21.5 miles of ways. It is also located next to a bombing range. The mineral potential is moderate to high in the area.

Desatoya Mountains contain 12 miles of cherrystem roads and 8 miles of ways. The area will be impacted by low level military flights. Manageability of the area will be very difficult because of the roads and ways.

Job Peak contains 11 miles of ways and 10 cherrystem roads totaling 21.3 miles. The area contains moderate mineral potential and high geothermal potential. The Supersonic Operating Area would severely impact the area.

The above listed factors for all of the WSA's make the areas unsatisfactory for WSA designations.

Lands: We recommend the Preferred Alternative that would dispose of 116,500 acres.

Range Development: Since this money is generated through grazing fees and should be used to improve the resources, we recommend spending $517,975.00 as in the Commodity Production Alternative.

Richard L. Rowe
Regional Coordinator

Thomas W. Ballow
Executive Director

RLR:sMc

STATE OF NEVADA
DEPARTMENT OF WILDLIFE
1100 Valley Road
P.O. Box 10678
Reno, Nevada 89520-0022
(702) 789-0500

WILLIAM A. MOLINI
Director

December 20, 1983

Ms. Linda Ryan, Director
Office of Community Services
1100 East William, Suite 109
Carson City, NV 89701

Dear Linda:

We appreciate the opportunity to review and provide comment on the Lahontan RMP/EIS and associated Wilderness Technical report which were submitted by the Carson City District office of the Bureau of Land Management (SAI NV#84300027). As with several of the most recent RMP's completed by the BLM in Nevada, we find that the document lacks appropriate management actions to accomplish the primary objective of improving the condition and productivity of public rangelands. As a result of our review we would suggest the following management actions:

1. The protection and/or restoration of 53 miles of riparian habitat to a fair or good condition should be a management objective.

2. Wild horse herds should be managed at reasonable levels or closer to the 1971 estimates since many herds are now at peak population levels.

3. The habitat should be managed in such a fashion that reasonable numbers of big game wildlife species can be achieved.

4. Deferred grazing systems should be implemented as a means of improving the forage resource; protection during the spring months is particularly important in many areas.

5. Action plans need to be developed on all "I" allotments using a consultation and coordination process.

Our agency has previously provided input on the wilderness issues through a combined meeting of state agency representatives and we therefore have no further comment at this time.

Comment Letter 25

If you have any questions on the above or feel a need for further input at this time, please advise.

Sincerely,

WILLIAM A. MOLINI, DIRECTOR

Patrick O. Coffin
Acting Director

RPM:cb
cc: Region I

STATE CLEARINGHOUSE
FEDERAL IMPACT
REVIEW PROGRAM

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 100
CARSON CITY, NEVADA 89710
(702) 885-4420

TO:

__ Governor's Office
__ Attorney General
__ Administration
X Agriculture
__ Commerce
__ Community Services
__ State Job Training Office
__ Economic Development
__ Education
__ Employment Security Department
X Dept. of Minerals
__ Equal Rights Commission
__ Human Resources
__ Indian Commission

__ Labor Commission
X Legislative Counsel Bureau
__ Library
__ Prisons
__ Public Service Commission
__ Taxation
X [redacted]
X UNR-Bureau of Mines
X UNR-Dept. of Range, Wildlife, and Forestry
XX Wildlife
__ _____
__ _____
__ _____

Conservation and Natural Resources

X State Lands
__ Conservation Districts
__ Environmental Protection
X Forestry
X Hist. Preservation & Archeology
XX State Parks
X Water Planning
__ Water Resources

FROM: Linda A. Ryan, Director

SAI NV # 84300027 PROJECT: LAHONTAN RMP/EIS

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:

1) the program's effect on your plans and programs;
2) the importance of its contribution to State and/or areawide goals and objectives;
3) its accord with any applicable law, order or regulation with which you are familiar and/or
4) additional considerations.

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN [redacted]. Write out your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office immediately.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

__ No comment on this project
X Proposal supported as written
X Additional information (see below)
__ Conference desired (see below)
__ Conditional support (outlined below)
__ Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

Impacts on current policy or future goals of the Nevada Department of Transportation by stated alternatives within the "Lahontan Resourse Management Plan and Environmental Impact Statement" are minimal at best. A slight increase in traffic volumes might possibly be realized due to improvements in recreational targets. Construction of grazing allotment fence could effect auto/cattle accidents. Where such fences would intersect or run adjacent to a State Interest Highway, an inventory or location description would assist this agency in monitoring for possible hazards. Such an inventory if an applicable alternative is selected, should be forwarded to Mr. Frank C. Page, Chief Safety Engineer, Nevada Department of Transportation, 1263 South Stewart Street, Carson City, Nevada 89712.

Larry L. Fung — Reviewer's Signature
Transportation Analyst IV (NDOT) — Title
885-3461 — Phone
12/15/83 — Date

Comment Letter 25

RICHARD H. BRYAN
Governor

STATE OF NEVADA

ROLAND D. WESTERGARD
State Historic Preservation Officer

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF HISTORIC PRESERVATION AND ARCHEOLOGY
201 S. Fall Street
Capitol Complex
Carson City, Nevada 89710
(702) 885-5138

December 12, 1983

MEMORANDUM

TO: John Walker, Office of Community Services

FROM: Alice M. Becker, Staff Archeologist Alice M. Becker

SUBJECT: LAHONTAN RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, SAI NV#84300027

The Division participated with other state agencies in commenting on the BLM's proposed wilderness designations for the Lahontan Resource Area. Our comments in general are included with those to be submitted by the state of Nevada. We especially support the designation of the Desatoya WSA; many archeological sites, including Topia Cave, are located in the area and stand to benefit from the added protection.

25-1 The Reaource Management Plan/EIS is inadequate in regarda to cultural resourcea. Reference must be to the Rangeland PMOA between the BLM and the Advisory Council on Historic Preservation dated January 14, 1980. The report must alao refer to the completed Class I and II inventories identifying historic and cultural properties in the resource area.

Within the Standard Operating Procedures, it should be made explicit that when it ia not feasible to avoid adverse effects on properties of National Register quality, the BLM will consult with the SHPO to develop mutually acceptable measures to mitigate the impact of the proposed action. Thia information must be included in the final RMP/EIS.

If there are any questions regarding these comments, BLM staff should contact ua.

AMB/lmw

Response Letter 25

25-1 A Class I Cultural Resources Overview has been completed for the District. To date approximately 12,000 acres of Class III surveys and 40,500 acres of Class II surveys have been completed within the Lahontan RMP area. Part 2 of the Class I Overview indicates specific cultural and historic properties and the relevant surveys in which the properties were identified.

A programmatic Memorandum of Agreement with the Advisory Council on Historic Preservation calls for further Class II inventories in the EIS area. Contingent upon funding, these inventories will be undertaken.

On p. 2-16 of the draft RMP/EIS under Standard Operating Procedures is the consultation process with the SHPO for National Register quality sites.

NEVADA BUREAU OF MINES AND GEOLOGY (702) 784-6691
MACKAY SCHOOL OF MINES
UNIVERSITY OF NEVADA • RENO
RENO, NEVADA 89557-0088

8 November 1983

Comments on Mineral Potential
Wilderness Study Areas
Lahonton Resource Area

CLAN ALPINE MOUNTAINS (NV-030-102):

There are two historic mining districts on the borders and extending into the area of this proposed WSA. The Alpine, or Clan Alpine district is located at the southern tip of the mountain area and extends along the eastern range front from Florence-Star-Clan Alpine canyons to Tungsten Mountain. 'The historic mining district, that part to the south near Florence Canyon, was organized in 1864. There is no recorded production, but a ten-stamp mill was built to service numerous prospects. Schrader, 1947, describes a mineralized area 4 miles wide by 15 miles long extending from Alpine to Granite Point (Tungsten Mountain) with a main mineralized zone 4 miles long by 3 miles wide at Alpine. A large portion of this documented mineralized zone is within the boundariea of the proposed WSA. The host rock at Alpine is rhyolite and latite, it is described as silicified with quartz-adularia alteration. The structures in the area trend both northwest and northeast, and describe a sheeted zone. The silver-gold mineralization here could have potential as a low-grade, large tonnage prospect. To the northeast, at Tungsten Mountain on the northeast margin of the WSA, tungsten has been mined from a contact deposit.

The district is credited with over 4400 units of WO_3 production, some of which has come from the Gila Peak mine, on the west side of Mt. Grant (Gila Peak) in the heart of the WSA (Stager, in press).

The Bernice district, located on the northwest margin and extending into the WSA from the northwest, was discovered in the 1870's, and has produced over $155,000 in silver, gold, and antimony. The actual production may excede the recorded. Schrader (1947) credits the district with over one-half million in gold and silver alone in the 1886-1890 period.

Perhaps the most favorable portion of the WSA for minerals lies within the area between Bernice and Tungsten Mountain. There is a strong NW structural trend which cuts the range in this area, with pre-Tertiary sediments and intrusive rocks cropping out along the trend. The presence of rocks favorable for mineralization in the pre-Tertiary section, the presence of strong atructurea, and the presence of gold, silver, antimony, arsenic, and mercury mineralization in and surrounding the area make this portion of the Clan Alpine range very favorable for mineral exploration. There could be deposits of precious metals, antimony and tungsten within the area defined by the WSA boundaries.

DESATOYA (NV-030-110):

A large portion of this area is underlain by what is probably a great thickness of unmineralized volcanic rocks, possibly filled calderas. There are, however, two areas of documented mineralization on the margins of the proposed WSA that should be recognized. Gold-silver prospects to east of Cold Springs Station on the west central border of the WSA have recently been the site of exploration by major mining companies. There could be potential for extensions into the WSA.

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8 November 1983

Comments on Mineral Potential
Wilderness Study Areas
Lahonton Resource Area

DESATOYA (NV-030-110) continued:

25-2 On the south border of the WSA, at Carroll Summit, the old district of Gold Basin lies north of the Highway, partly within the WSA. About $20,000 in gold and silver was produced after 1911 from this district, from quartz veins along faults in a rhyolite tuff. The lack of mining claims in this area may be partially explained by the fact that the entire mining area has until recently been withdrawn as a vegatative study plot.

STILLWATER RANGE (NV-030-104):

The high minerals favorability of the entire Stillwater range is underscored by the GEM reports of the area. Essentially the entire flank of the range rates "high" while the east-central portion rates "moderate". Gold exploration in Fondaway Canyon by Tundra Resources, a Canadian firm, is reported to have delineated a zone of gold mineralization extending several thousand feet along an east-west trend. This trend would project into the WSA from the west. Favorable host rocks occur within the WSA, adding to its ranking of high to moderate for mineral potential.

REFERENCES:

Schrader, F. C. (1947) Geology of the Carson Sink Area, Nevada: U.S.G.S. open-file report.

Stager, H. K. (1977) Geology and Mineral Deposits of Lander County, Nevada, Part II, Mineral Deposits, NBMG Bulletin 88.

Stager, H. K. (in preparation) Tungsten Deposits of Nevada: NBMG Bulletin.

Response Letter 25

25-2 In December 1968, approximately 2,488,400 acres in Lander County were classified for multiple use management pursuant to the Classification and Multiple Use Act of September 18, 1964. Although all of this land was segregated from appropriation under the agricultural land laws only seven areas containing 960 acres were further segregated from appropriation under the mining laws.

The only land in the vicinity of the Desatoya Mountain WSA which was segregated against mining was an 80-acre parcel in N1/2 SE1/4, Sec. 8, T. 16 N., R. 38 E., known as the Carrol Summit Vegetative Study Plot. This segregation was designed to protect a one acre study area in which the University of Nevada-Reno wished to study the restoration of black sage and galleta grass. Approximately 10 acres of this segregated area actually lay in the WSA.

In December 1982, segregation against agricultural entry on all 2,488,400 acres was vacated. In February 1983, segregation against mineral entry on the 80 acres in question was vacated and the lands were open for mineral entry on March 17, 1983. It should be noted that the case file indicates the mineral segregation of this 80 acre parcel was never shown on the Master Title Plat. Consequently it was not generally known that the segregation was in effect and a few mining claims were located within the area, although outside the WSA. The case file further noted that, "Opening the lands to mineral entry will only remove a legal restriction which has never been recognized in the field."

Because of the small acreage which had been segregated against mineral entry and the fact that this segregation was never recognized in the field, it is unlikely that mineral exploration of the Carrol Summit area was in any way adversely affected during the period of segregation.

Comment Letter 26

January 2, 198[illegible] Please read this anyway.

District Manager
Carson City District
1050 E. Williams Ste 335
Carson City, NV 89701

Dear Sir:

Usually I reply promptly but I realize that I delayed my reply too long. I am still very much interested.

I much prefer resource protection--with this president who understands so very little about the importance of environmental and natural resources to the welfare of our country environment needs all the protection it can get.

Yours truly,

Ethel W Thornley

ETHEL THORNILEY
18653 SCHOENHERR
DETROIT MI 48205

Comment Letter 27

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

PLEASE REPLY TO: ☐ _____

☐ GREAT BASIN GROUP
P.O. Box 8096
University Station
Reno, Nevada 89507

☐ LAS VEGAS GROUP
P.O. Box 19777
Las Vegas, Nevada 89119

January 1, 1984

Tom Owen, Manager
BLM/Carson City District
1050 E. Williams St.
Carson City, NV 89701

Dear Manager Owen,

On behalf of the Public Lands Committee and the Great Basin Group of the Toiyabe Chapter of the Sierra Club, we are submitting these comments on the Lahontan Draft Resource Management Plan and Draft Environmental Impact Statement.

27-1 In general, we find the DRMP/DEIS to be procedurally inadequate. 1. It does not include a no grazing alternative. 2. It does not include an adequate range of alternatives: i.e., lands section - 116,500 acres to be disposed in 3 of 5 alternatives; wildlife section - mule deer % change - 76% in 4 of 5 alternatives. 3. There is no substantive difference between the mid-range alternative and the preferred alternative in 4 of 5 categories of

27-2 actions: identical actions are proposed in 3 areas of rangeland management and in lands (Table 1). Only the wilderness recommendations differ substantially with the supposedly balanced preferred alternative proposing total elimination of 2 of the 4 wilderness study areas for wilderness designation, or an acreage less than 1/2 of the mid-range alternative.

27-3 The DRMP/DEIS is substantively inadequate. 1. The proposed actions will result in only a 2-3% improvement in ecological condition. 2. The cost benefit of projected range improvements

27-4 must be questioned as the most optimistic alternative projects only a 21% increase in AUMs, at a cost of $38.46/AUM or $19,184.26/permittee. 3. All alternatives are basically no-

27-5 action alternatives which don't improve range conditions, don't substantially increase forage for livestock, don't provide for reasonable wildlife numbers, don't find any ACEC's in 2.4 million acres. All most of the alternatives do is eliminate over 3/4 of the acreage of the WSAs from wilderness recommendation due to speculative minerals. 4. The Lahontan is another programmatic EIS, with "problems" and "solutions" shuffled around to make up several "alternatives," all of which are basically - "do nothing and monitor."

Chapter 2
Specifically, eliminated from consideration despite public requests is analysis of a no grazing alternative. The rationale cited for its rejection on p.2-1 is very weak. The claim that

To explore, enjoy, and protect the natural mountain scene . . .

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Response Letter 27

27-1 There is no procedural requirement for a no grazing alternative. It was not included because total elimination of livestock grazing on the public lands is neither reasonable nor attainable under existing law. While three of the five alternatives propose disposal of up to 116,500 acres, the range of alternatives is from zero to 116,500 acres. Wildlife alternatives include a range of aquatic and riparian protection from zero to 54.2 miles, protection of from zero to 130 springs and installation of from zero to 15 wildlife guzzlers.

27-2 The preferred alternative was developed from input provided by the public during the scoping process and from further analysis of the data. This process resulted in selection of the midrange alternative for the range and lands issues and the development of an additional alternative for the wilderness issue.

27-3 In view of the fact that 73 percent of the RMP area has low vegetation response potential and the number of benefitting range improvements is limited by projected funding, two to three percent is an acceptable level of improvement. Furthermore, the projected improvement reflects relative changes between condition classes. It does not represent changes within condition classes. This is only one way of depicting general impacts in a summary table. For a more detailed, allotment specific analysis of changes in vegetation condition please refer to Chapter 4 of the Draft RMP/EIS.

27-4 A cost of $38.46 per AUM is not unreasonable since the de facto market value is about $40. Many other factors enter into a benefit cost analysis--the timing of cost and benefit flows is very important as are wildlife and other resource benefits and maintenance and replacement costs. All of these factors will be evaluated in the benefit cost analyses to be prepared at the activity planning stage of this RMP process as provided in Standard Operating Procedure #6 in the Draft RMP.

27-5 Summary Table Two provides a comparative review of the environmental consequences of the alternatives. It indicates that all alternatives except no action improve the ecological condition of the range, the commodity production alternative substantially increases livestock use, and all alternatives except no action provide for a trend towards reasonable numbers of mule deer with proper vegetation management and concurrent population management by NDOW. Please refer to response 12-3 regarding ACECs.

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27-6 the analysis of a no grazing alternative "would not have resolved the grazing issues in the RMP area" is a non-sequitur and might also apply to categorizing allotments into M, I, and C. The claim that "overall vegetation utilization is only 38%" does not excuse BLM from improving its range management practices, does not explain away the problems summarized in Table 3-8 or the less than satisfactory range conditions summarized in Table 3-1 and does not justify the elimination of a no grazing alternative.

In addition, overgrazing in the Lahontan RA appears to be reduced semantically to "overuse of some riparian areas." (p. 2-1) We disagree that overgrazing only occurs at riparian areas and on examination of the narrative disagree that "68% of the riparian sites are being damaged by livestock and wild horse use" (p. 3-9) represents some problem, but actually is a critical problem for wildlife dependent on this one percent of the total land area in the RA.

27-7 And, finally, consideration of a no grazing alternative won't really "force the typical public land rancher out of business" any more than consideration of a no wilderness alternative would land BLM in legal trouble with wilderness protectionists. In fact, a no grazing alternative was considered in the Egan DRMP/DEIS and no ranchers were driven out of business nor did it "result in the breakup of family and community stability.". The Ely BLM District instead analyzed the no grazing alternative "to show the possible range of management actions that could be implemented."

27-8 The reference to the likely result of "prolonged litigation from the livestock industry" is particularly ludicrous as the omission of a no grazing alternative in a prior EIS written by the Carson City District, the Reno EIS, did lead to "prolonged litigation" from NRDC! And how CEQ regulation 1502.14 could

27-9 excuse the consideration of a no grazing alternative in the Lahontan RMP, but require its consideration in the Egan RMP is a really neat trick. Besides, as we understand it, the no grazing alternative is specifically required as part of the settlement of the NRDC lawsuit against programmatic BLM EISs, not just as one of a range of alternatives required by NEPA.

27-10 We disagree with the discussion of Issue #1 on p.2-1. While overgrazing may include "competition among grazing animals," poor livestock distribution, and year-round grazing, it generally refers to a situation in which forage demand exceeds forage supply. Although the Lahontan DRMP speaks to range conditions and livestock management problems, it does not estimate how much forage demand exceeds forage supply, nor does it propose actions which would adjust demand to supply.

27-11 While we generally support the resource protection alternative, we feel it is a feeble effort in an overall inadequate plan to balance land management among all the multiple uses, especially at sustained yield levels. Are 46,696 AUMs (plus 17,000 other AUMs) within the carrying capacity of the Lahontan RA? If not,

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Response Letter 27

27-6 The key point to the analysis on page 2-1 is that elimination of livestock grazing would not solve the most significant grazing related problem in the RMP area--overuse of riparian areas--because wild horse overuse would continue. That section has been modified to make that point more clear. Please refer to the revisions and errata section of this document.

27-7 The analysis on page 2-1 refers not to consideration but to implementation of the no grazing alternative.

27-8 The key point to this section is that livestock grazing is a valid use of public lands as determined by law. Livestock grazing was an established use of the public lands long before passage of the Taylor Grazing Act of 1934. Congress, in passing that act and, more recently, the Federal Land Policy and Management Act of 1976 and the Public Rangelands Improvement Act of 1978, directs the Secretary of the Interior to control and regulate livestock use. Congress clearly did not intend for the Secretary to eliminate livestock use. This section has been modified to make that point more clear. Please refer to the revisions and errata section of this document.

27-9 Due to the reasons outlined on page 2-1 the No Grazing alternative was dropped as unreasonable and not implementable based on section 1502.16 of the CEQ regulations which states that agencies shall "rigorously explore all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated" (emphasis added). Furthermore, the court settlement referred to does not require a no grazing alternative.

27-10 Current available data indicates that allotment average forage use is excessive on only one allotment. Further data will be collected to determine if adjustments in grazing use are needed to correct imbalances in the supply and demand for forage.

27-11 The analysis on page 4-11 of the Draft RMP-EIS concludes that vegetation condition, trend, and productivity would decline on three allotments indicating that stocking levels exceed carrying capacity. Under this alternative, additional range monitoring data would be used to make future needed adjustments in stocking rates.

Comment Letter 27

we couldn't support that level of grazing use.

Table 2-1 is a refreshing part of the DRMP, perhaps a first in Nevada. We support the display of the breaking down of range improvements among cattle, wild horses, and wildlife, although not necessarily the actual breakdown. We were pleased to see water developments planned as part of wild horse management and riparian area protection as part of wildlife management. However, we totally oppose range improvements unless these are part of an AMP or HMPs, which provide for overall management. Otherwise, range improvements are just money down a rathole, if more serious range management problems are not simultaneously addressed.

27-12 Table 2-2 looks good, but would be far more useful to these reviewers if it would include condition classes on all riparian areas and streams. Then, we would be able to determine whether the protection of 54.2 miles of stream is significant or merely a token amount of protection.

27-13 The discussion of objectives under wilderness (p. 2-7) is quite a problem. Removing "parts of the wilderness study area with the lowest wilderness quality" from portions recommended as suitable for wilderness is not permitted by the Wilderness Act. In fact, the Wilderness Act and BLM regulations state that not every foot of a wilderness has to possess equal wilderness attributes. Common sense would indicate to most of us that areas on the edge of a wilderness would not necessarily possess the same degree of outstanding opportunities for solitude or primitive recreation as interior sections. Most of us would agree, however, that eliminating the areas just within wilderness boundaries will eventually eliminate the wilderness. Such a rationale is illogical, ill-considered, and illegal.

27-14 We oppose the transfer from federal ownership of 116,500 acres. Such a huge disposal is out of political favor now anyway, as privatization has gone the way of Secretary Watt. BLM makes no effort to support its contention that the disposal of 116,500 acres is in the national interest. What managment problems does checkerboard land pose? Have Gabbs, Fallon, Fernley, and Dixie Valley requested lands for community expansion? Current law provides for public land disposal for community expansion and public purposes, not for private profit.

We would support consolidation of checkerboard land if a management problem actually exists, but not transfer. We would like to point out that continued BLM management of most public lands is not cost-effective. Thank God that cost effectiveness is not the only criteria for public land management. And while Fallon may need lands for community expansion, Gabbs' depressed economy and the sonic boom threat to property values in Dixie Valley would argue against the need or ability for extensive public lands for community expansion. And before "lands with possible agricultural potential in Edwards Creek Valley" are sold, BLM should require legal proof that there is unallocated

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Response Letter 27

27-12 A "point system" was not used to rate riparian areas or streams into condition classes. The wildlife inventory consisted of mapping, photographs, description of flora and fauna, descriptions of conflicts and hazards (ie, drowning), estimate of water flow (if present), and type of use by the fauna.

As far as 54.2 miles being a "token amount", 54.2 miles represents approximately 92 percent of the total 59 miles of streams in the planning area.

27-13 The Wilderness Act does not prohibit deleting portions of study areas. Such deletions were prohibited by Bureau regulations during the inventory phase of the Wilderness Review Process. However, during the study phase of the process, qualitative differences in wilderness values of various portions of the Wilderness Study Areas are considered. It is appropriate to take these qualitative differences into consideration in the development of alternatives for this RMP. In the development of the Mid Range Alternative (page 2-7), areas with lower wilderness values were retained where needed to protect adjacent higher quality areas. It should be noted that as the objective section on page 2-7 states, several criteria were employed in the formulation of this alternative, only one of which was the quality of wilderness values.

27-14 Refer to response 2-5.

Comment Letter 27

State water in the valley to support agricultural uses. Otherwise, the problems of DLE abandonments will be repeated. Also, the 116,500 acreas used in 4 alternatives is inadequate as a range of alternatives and violates NEPA.

27-15 While the Sierra Club has supported and participates in the CRMP process, we still do not accept it as a substitute for public control of public land decision making. What if a permittee refuses to go through CRMP? BLM cannot force a rancher to particpate. Who then makes grazing and other resource decisions? How will the public be involved? What allotments in the Lahontan RA are scheduled for CRMP in 1984?

27-16 We object strenuously to the inclusion of "Grazing Treatments and Systems" in the DRMP. Not only are programmatic solutions to programmatic problems illegal, they are unreasonable and won't work! The "treatments" are lifted, nearly word for word, from the Reno RMP/EIS which is in litigation partly because of its programmatic format. Why does the Carson City District persist in this error?

27-17 While SOP #6 states that a Benefit/Cost analysis will be performed on range improvements, it does not state that a 1.0 ratio will be required. Does BLM plan to fund "improvements" where costs exceed benefits?

27-18 In SOP #14, don't mineral rights stay with the federal government whether of nominal or of significant value?

27-19 Shouldn't the determination of suitability in SOP #15 for land disposal also include an analysis of wildlife habitat values or livestock grazing values or wild horse management?

Chapter 3

27-20 Why doesn't the description of phenology on p.3-5 match that of Table 3-3? We find it peculiar that according to Table 3-3, "critical growth periods" for most key plant species don't occur until 5-1, long after too early grazing has perpetuated the continuing degradation of plant communities by livestock. We tend to accept the statements on p. 3-5 as closer to standard professional range management and botanical conceptions of phenology. The point is important as Table 3-3 would apparently excuse BLM from efforts to eliminate too early spring grazing which even BLM acknowledges results "in the reduction of both the quality and quantity of forage" as well as the degradation of other resource values.

Tables 3-1, 3-2, and 3-8 were very informative, compared to the rest of the DRMP/DEIS. We do find it perplexing that BLM can calculate an allotment's ecological condition, trend, and utilization "for analysis purposes only," but not for the purposes of establishing stocking levels - i.e., adjusting livestock numbers to the carrying capacity of the RA. (p. 4-1)

We reject the categorization of allotments as an exercise in

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Response Letter 27

27-15 Consultation and coordination with interested parties will occur throughout the decision making process. This input will be taken into consideration by the Bureau manager responsible for making grazing and other resource decisions. This decision making authority is outlined in the Federal Land Policy and Management Act. The Coordinated Resource Management and Planning (CRMP) process is the preferred method of obtaining public input, but if it does not prove feasible for a particular activity plan, public input will be obtained through other methods. The CRMP process is most appropriate at the activity planning level which will be initiated in 1985; none have been scheduled for 1984.

27-16 This section was included in the document in order to provide the public with additional information about the types of grazing treatments and systems that would be implemented. Particular treatments and systems for individual allotments will be developed during the activity planning stage of this process.

27-17 Allotment investment proposals with benefit/cost ratios less than 1:1 would not be implemented unless they can be justified by resource or social criteria as directed in the Bureau's Final Rangeland Improvement Policy.

27-18 The Bureau has the authority to sell mineral rights where appropriate.

27-19 Standard Operating Procedure No. 15 includes but is not limited to the factors listed. The wording has been modified to make that point clear.

27-20 Please refer to the last paragraph of the phenology section on page 3-5 which states that Table 3-3 lists critical growth periods while Table 3-4 depicts average phenology. The periods listed in Table 3-3 were obtained from a literature search and are not specific to the Lahontan RMP area. Table 3-4 and the narrative on pages 3-5 were summarized from analysis of the Nevada Rangeland Phenology Study by NRC, Inc. This data is specific to the Lahontan RMP area and was given greater weight in the RMP analysis.

futility, designed to fool the public into believing that BLM is actually doing something about overgrazing on the public lands. However, we do feel strongly that the White Cloud allotment should be placed in the I category. We do not see how BLM can regard an allotment with year-round grazing, with almost 25% of its acreage in poor ecological condition and over 20% of its acreage in poor forage condition, and with over 16% heavy to severe utilization of vegetation to be in satisfactory range condition with satisfactory management and no land use conflicts. 27-21

Table 3-5 has 2 errors we are aware of. 1. There is no plant called Erigonum lemmoni. The plant is Eriogonum lemmoni. 2. A very rare plant which grows in the Truckee Canyon is omitted - Astragalus porrectus. We hope other T&E plants have not been ommitted. 27-22

The wilderness resource was shabbily treated in the preferred alternative. The Lahontan Wilderness Technical Report shows little sensitivity to or appreciation of wilderness, resulting in abominable wilderness recommendations. We have hiked, camped, and backpacked extensively in all 4 WSAs, sometimes by ourselves and sometimes with Sierra Club and other groups who enjoy the experience of desert wilderness. We consider ourselves as much "locals" as residents of Gabbs and Dixie Valley. These WSAs are the closest to Reno, Sparks, and Carson City where we can enjoy wilderness without the crowds who have to make reservations for Sierra Nevada wilderness trips.

We support the Midrange Alternative for the Clan Alpines of 150,000 acres. Its spectacular wild places are favorites of ours, for both primitive recreation and for true solitude. Some Sierra Club members have been visiting the Desatoyas for decades, enjoying the high secluded basins and the challenges of its rugged terrain. We support the preferred alternative of 43,045 acres. 49,000 acres in Job's Peak should be recommended as wilderness. Its proximity to Reno (little over an hour drive) makes it a favorite for challenging day hikes. We support the Stillwater as wilderness to include 40,000 acres. We are still looking for a fossil site found one year and lost after flash floods changed the topography of the nearby area. We recommend maximum wilderness protection for all 4 areas.

We also find it hard to believe that BLM cannot find areas of critical environmental concern in the 2.4 million acres of the Lahontan RA. Since BLM failed to recognize its ACECs, we would like to support NORA's nominations of Grimes Point, Graves Cliffs, Carson Sink Sloughs, Sand Mountain, Dixie Valley Earthquake Fault Zone, Wonder ghost town, Kaleidoscopic View, Lahontan Reservoir East Petroglyphs, and Soda Lake. 27-23

In conclusion, we find the Lahontan DRMP/DEIS to be a dismal failure of a plan, designed to uphold the status quo, and afraid to propose necessary actions to improve range conditions for all the multiple resources and users. The few good actions proposed are too little and too late. The big problems of improving range

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27-21 The acreage in poor ecological condition is primarily located in the flats bordering the Carson Sink and has low potential for improvement in ecological condition. The acreage in poor forage condition consists of pinyon juniper woodlands in the Stillwater Mountains. Improvement of forage condition in this area would require treatments such as chaining, burning or chemicals. Such treatments are currently considered unfeasible in the area due to steep topography and the existence of other values; e.g. recreation, aesthetics, etc. Heavy utilization does occur near watering facilities, bed grounds, salt grounds, and well traveled trails. It is unfeasible to eliminate all areas of heavy use where grazing occurs. About 0.02 percent of the allotment has severe use. Since this allotment has an average utilization of 30 percent, trend is static, and the opportunity to improve management through range improvements is limited, it was placed in the M category.

27-22 The spelling of Eriogonum has been corrected. Please refer to the errata section of this document. No occurrences of Astragalus porrectus have been reported in the RMP area. The Truckee Canyon site is west of the RMP area.

27-23 Refer to Response 12-3.

Comment Letter 27

managment and adjusting livestock numbers to range carrying capacity are totally avoided by denying adequate "data" on which to base adjustments. We feel fairly certain that the Carson City District will never have adequate data on which to base reductions in livestock numbers, despite the fact that it has better resource data than any other BLM district in Nevada. Only Congress and the courts will improve range management in the Lahontan RA.

Thank you for considering our comments.

Sincerely,

Rose Strickland, Chair
Public Lands Committee

Dennis Ghiglieri, Chair
Great Basin Group

Comment Letter 28

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

720 Brookfield Drive
Reno, Nevada 89503
January 1, 1984

Tom Owen, District Manager
Bureau of Land Management
1050 East Williams St., Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

Thank you for the opportunity to comment on the Draft Lahontan Resource Management Plan and Environmental Impact Statement. This letter will include general comments on the EIS. Specific, detailed comments on the wilderness recommendations have been sent to you by Roger Scholl, Wilderness Coordinator for the Toiyabe Chapter, under separate cover.

While your document includes interesting data and much factual information, it is difficult for us to understand the anti-wilderness bias, the inadeouacy of protection for riparian areas, and the disposition towards land disposal displayed in your preferred alternative. Unfortunately, this preferred alternative is the worst one of the Nevada State Division preferred alternatives released so far. As you point out on Page 2-1 of the document, the focus of your planning rests on three issues--rangland management, wilderness, and land disposal. If rangeland management includes all facets of land management such as wildlife habitat and riparian areas, we have no quarrel with this priority. We also have no objections to having wilderness as a priority item. However, land disposal is not a priority and should not be included. Land disposal should be confined to the lands which impact urban areas or are needed for possible recreational sites. The resource protection alternative, which identifies approximately 2100 acres for disposal, is the only alternative which makes sense. The BLM needs to keep other lands for permanent retention or for trading stock for environmentally sensitive lands which need to be acquired. The proposed land disposal identified on th map in Dixie Valley and Edwards Creek Valley occurs in land primarily owned by the BLM and is totally unacceptable.

According to Table 3-1, there are 308,000 acres of land in poor ecological condition, 1,147,000 acres in fair condition, 585,000 acres in good condition, and only 14,000 acres in excellent condition. This indicates that approximately two-thirds of the

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Comment Letter 28

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

Tom Owen
1/1/84. Page 2.

28-1 Lahontan Resource Area is in unsatisfactory ecological condition at the present time. In your Preferred Alternative you propose to continue livestock grazing at the present level, reduce the land base by five percent, monitor areas which you already know are in unsatisfactory condition, and effect a two percent improvement in the ecological condition. This seems doubtful. We are most concerned about riparian areas which, as you state, are "limited in occurrence...but provide necessary (critical) habitat components for wildlife in the Resource Management Area." According to your statistics, 68 percent of riparian areas are damaged by use (mostly by cattle), but there is no definite plan in the preferred alternative to fence these damaged areas.

We are also concerned that no areas have been identified for ACEC's and that so little attention has been paid to archeological and historical values of this important resource area.

In summary we support the Resource Protection Alternative for wildlife and lands, the midrange alternative for wild horses, and a modified midrange alternative for livestock--one that may reduce grazing but not to the 27 percent level proposed in the resource protection alternative (since while that may be ecologically desirable, it may also be politically unfeasible.) Emphasis should be put on the protection of riparian areas, both springs and streams. Wildlife habitat for both game and non-game species needs to be enhanced. Wildness recommendations should include, as an absolute minimum, those areas identified in the "balanced" Midrange Alternative. Only land needed by communities should be disposed of at the present time.

We request that you examine your "unbalanced" preferred alternative carefully and revise it to fit the area conditions and your responsibility as land manager for public lands to benefit all of the public of the state of Nevada and the United States.

Sincerely,

Marjorie Sill

Marjorie Sill
Conservation Chair

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Response Letter 28

28-1 Ecological condition ratings (poor, fair, good, excellent) are based on plant species and their abundance at the present time as compared to plant species and their abundance in pristine condition, prior to human impact.

This is a comparison of what is today to what was in the past. It is not a judgement on the value of a plant or plants, nor can it be a judgement of present grazing management.

A fair ecological condition range may offer more resource values than an excellent condition range. A poor ecological condition range may indicate that only a revegetation program can improve the site or perhaps no improvement can be expected.

The statement that poor or fair ecological condition rangeland is unsatisfactory is not true. It places a judgement that untouched, unimpacted vegetation is superior to present vegetation without considering uses of the plant community or the needs of wildlife, wild horses, or livestock.

Comment Letter 29

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

January 3, 1984

Mr. Thomas J. Owen, District Manager
Carson City District
Bureau of Land Management
1050 East William St., Suite 335
Carson City, NV 89701

Dear Tom,

The attached maps and written comments are in addition to, and should be appended to, the oral testimony I presented on behalf of the Toiyabe Chapter of the Sierra Club at the November 9th public hearing on the Lahontan RA Wilderness Study Areas in Reno.

As we stated at the hearing, the Toiyabe Chapter commends the BLM for recommending portions of the Clan Alpine Mountains and Desatoya WSA's as suitable for wilderness preservation. However, we urge you to recommend the 158,504-acre Mid-Range Alternative boundary in the Clan Alpines rather than the Preferred Alternative.

29-1 In the Desatoyas, while we supported the Preferred Alternative at the hearing, we would like to strongly urge you to reconsider adding to this proposal the approximately 6,000 acres of the WSA between the Cedar Canyon (R-13) and Topia Creek (R-12) roads. As the Wilderness Technical Report properly states on page 50, way W-11 between these two roads is very bad and totally impassable much of the year. The managability of a Desatoya wilderness and its wilderness values would be significantly enhanced by the closure of this way as is pointed out on page 59 of the Wilderness Technical Report.

We also strongly urge you to recommend a portion of the Job's Peak WSA as suitable. Attached is a map of a modified Mid-Range Alternative boundary including approximately 49,000 acres of the WSAs' 90,000 acres. This 49,000-acre proposal possesses outstanding wilderness values, yet removes most of the resource and managability conflicts. We believe it should be recommended as wilderness.

Lastly, we have attached a map of a modified Mid-Range Alternative including approximately 40,000 of the Stillwater Range WSAs' 94,607 acres. It again includes the areas of highest wilderness values while eliminating most conflicts. We urge you to consider recommending an area along these lines.

A most important point regarding potential mineral resource conflicts with wilderness recommendations is that only the areas BLM recommends now as wilderness will have a USGS mineral study. So that, Congress - the final decision maker - may have the benefit

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To explore, enjoy, and protect the wild places of the earth

GREAT BASIN GROUP
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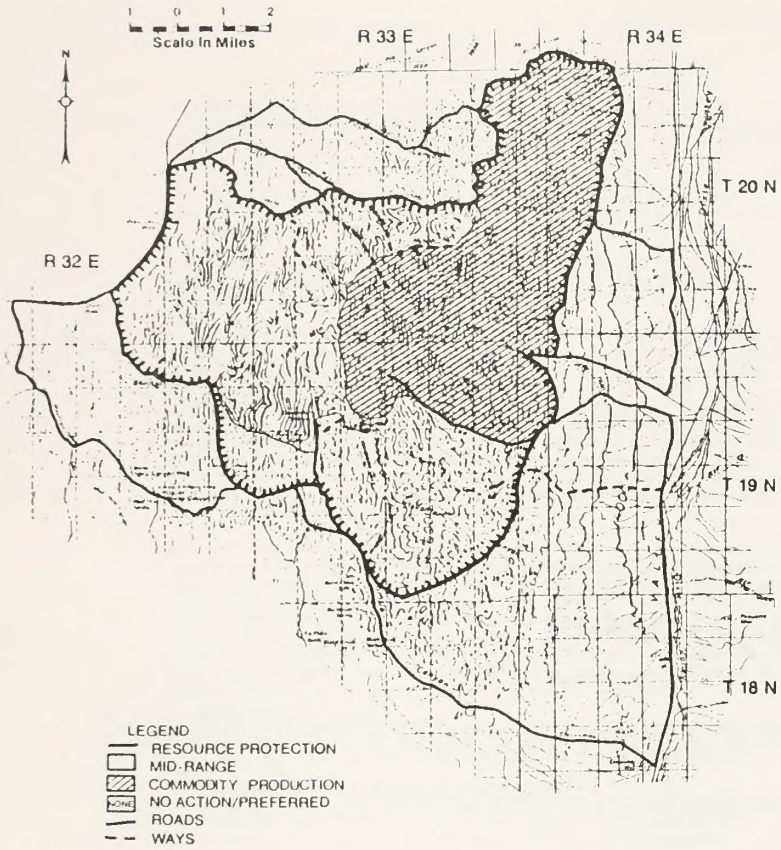
Response Letter 29

29-1 A re-examination of the Preferred Alternative for wilderness was conducted in light of the suggestions included in this comment letter. It was determined that the Preferred Alternative, as presented in the Draft RMP, assesses all resource values and conflicts and correctly identifies 111,511 acres as suitable for wilderness designation.



WILDERNESS ALTERNATIVES
JOB PEAK NV-030-127

Comment Letter 29

WILDERNESS ALTERNATIVES
STILLWATER RANGE NV-030-104

Comment Letter 29

of more information. Thus, if an area has plainly-evident wilderness values and possible mineral values, any error at this stage of the process should be on the side of recommending the area suitable for wilderness preservation.

Thank you again for the opportunity to submit our views. We look forward to working with you on the continuing management of these magnificent areas.

Sincerely,

Roger Scholl

Roger Scholl, Chairman
Wilderness Committee

Comment Letter 30

Alta Exploration, Inc.
6290 NEIL ROAD, No 210
RENO, NEVADA 89502
(702) 827-0111

December 30, 1983

Bureau of Land Management
1050 E. William Street #335
Carson City, Nevada 89701

Mr. Owen:

I concur with your preferred alternative recommendation to return the Stillwater and Job's Peak WSA to multiple use management, however I strongly disagree that non-wilderness designation will have an adverse affect upon the units in whole or any of the specific areas and/or eco-systems which you identified in your EIS.

Rather than a massive influx of development I would suggest a moderate amount of development. As mineral potential is developed in certain areas, the disturbances may become semi-permanent due to the general characteristics of the units the disturbances will soon disappear if not continuously maintained. The mineral potential of the Stillwater and Job's Peak units is to great to be removed from exploration and development.

I contend that the mineral potential in the Clan Alpine WSA, as proposed for wilderness designation in your EIS is to great to be removed from access for exploration and development.

Within the area proposed for wilderness designation the dominant rock type is Tertiary extrusive an minor intrusive rhyolite and rhyodacite. These are the same or similar to the host rocks for the deposits found at Farview Peak, Bell Mountain, Wonder, the Florence Canyon prospects in Churchill County, and are similar to the host rock for the famed Comstock Lode.

In addition, rocks of this type and age have long been considered potential host rocks for uranium or other radio active mineral deposits. Because of the current economic, depression in the uranium exploration industry there is very little activity anywhere. However at a future date when uranium prices improve relative to the economy there may be a substantial exploration potential within the proposed wilderness area. Geological reconnaissance indicates a basin or major synclinal structure within the proposed wilderness area. This type of feature is very favorable for deposition of uranium at proper chemical and structural traps.

Comment Letter 30

The geographical and topographical nature of the Clan Alpines is such that the area will remain in essentially its current state with very minor exceptions with a "No Action" alternative.

The Bureau in its evaluation has adopted a worst case scenario in all cases but the Preferred and Protection alternatives.

Many of the conclusions drawn have absolutely no known basis, or scientific data upon which such pessimistic conclusions could logically be drawn.

30-1 In the EIS the Bureau states that their would be an increase of $26,000 in annual regional income because of the designation of wilderness. Unfortunately the myoptic eye of the Bureau failed to notice the loss in income to the county from restricted exploration activity, which is usually the only major activity occurring during non-hunting portions of the year in the affected portion of Churchill County. The potential lost income due to reduced demand for lodging, food, fuel and supplies for exploration and drilling crews far out weighs the possible increase as projected by BLM from the preferred alternative.

Many of the wilderess qualities the Bureau is attempting to preserve are often adversely affected by wilderness designation. An excellent example is the Desolation Valley Wilderness Area. Where public accses has severly limited by the Forest Service, in an attempt to reduce over-crowding. Many visitors to a wilderness area come only because of the wilderness designation. The same visitors are the ones who leave trash about and have caused the "cesspool" smell on many of the trails in the Desolation Wilderness.

Under non-designaton those individuals who truly enjoy the wilderness will still be able to,while allowing the development and utilization of the nations natural resources.

For those reasons I urge the Bureau of Land Managsment to adopt a no action alternative as the preferred alternative.

Sincerely,

Robert G. Carrington
Vice President

d

Alta Exploration, Inc. 5290 NEIL ROAD, No. 210 • RENO, NEVADA 89502

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30-1 The $26,000 increase referred to applies only to recreation related income. It is recognized on page 4-54 of the Draft that opportunities for increased energy and mineral production would be foregone, but that this could not be quantified due to lack of data. This section has been modified to include income generated by exploration activities. Please refer to the errata section of this document.

Comment Letter 31

CALIFORNIA ASSOCIATION OF 4WD CLUBS INC.

5831 Rosebud Lane, Unit M-1
Sacramento, CA 95841
(916) 338-4540

January 3, 1984

BLM, Carson City District
District Manager
1050 E. William, Ste. 335
Carson City, NV 89701

Dear Sir,

The Draft Lahontan Resource Management Plan has been reviewed and we find Alternative five (5) to be the preferred resource management plan.

We thank you for the opportunity to comment on the draft plan.

Sincerely,

Ed Dunkley,
Administrator

ED:js

Comment Letter 32

Defenders
OF WILDLIFE

December 31, 1983

Mr. Thomas J. Owen
District Manager
Carson City District
U.S. Bureau of Land Management
1050 East William Street, Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

Defenders of Wildlife submits this letter as our comments and recommendations on your Lahontan Resource Area Draft Environmental Impact Statement (DEIS) and Resource Management Plan (RMP).

32-1 At the outset, we are greatly disappointed with the RMP recommendation to identify 116,500 acres of public land for sale or disposal. This proposal is appallingly reminiscent of the "privatization" concepts which were repudiated by the White House and Property Review Board and former Interior Secretary Watt during the summer of 1983. We especially oppose the Chilton Engineers "checkerboard" land sale. BLM's alternate sections adjacent to the Humboldt River must be maintained in public ownership, because of their importance for fish, wildlife, and other resource values.

32-2 We are also greatly disappointed that this Resource Area currently has no Areas of Critical Environmental Concern (ACECs) nor are any ACECs proposed or identified in the DEIS/RMP. This reluctance to identify and protect ACECs violates Sections 102(a) and 201(a) of the Federal Land Policy and Management Act. We recommend that you immediately proceed to identify and protect ACECs in this Resource Area. For example, we recommend the Carson Sink Sloughs for ACEC protection. This area contains important desert marshes north of the Stillwater National Wildlife Refuge. These desert marshes possess significant natural values, including their use by migratory waterfowl. In addition, we recommend Singing Sand Mountain for ACEC protection. This is a significant dune ecosystem with rare endemic invertebrates and other species. Unusual kit fox dens have been reported on this site.

We believe that the wilderness recommendations are patently inadequate. The Job Peak Wilderness Study Area (WSA) should be expanded to a total of 48,500 acres for wilderness protection.

1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

Response Letter 32

32-1 Refer to Response 2-5.

32-2 Refer to Response 12-3.

Comment Letter 32

2.

The Stillwater Range WSA should be recommended for 40,000 acres of wilderness. Much of this area contains important habitat for golden eagles, deer, and unique flora. The Clan Alpine Mountains WSA should receive wilderness protection for 158,504 acres. The Bench, Byers, Dyer, Horse, and Florence Creek Canyons have especially important riparian and watershed benefits.

Finally, we support and applaud BLM's Preferred Alternative of 43,045 acres of wilderness protection for the Desatoya Mountains WSA. This area contains diverse and productive natural values.

Thank you very much for considering our views.

Sincerely,

Richard Spotts
California/Nevada Representative
Defenders of Wildlife

5604 Rosedale Way
Sacramento, California 95822
(916) 442-6386

RS/js

Comment Letter 33

December 30, 1983

TO: Thomas J. Owen, District Manager
BLM-Lahontan Resource Area

Dear Mr. Owen,

This letter is to convey to yourself and the staff of your office my views concerning the Draft Environmental Impact Statement issued for the Lahontan Resource Area. It is my understanding that letters such as these are not necessarily read for content but rather tallyed as for this or against that; therefore I will keep my comments very brief.

It is my feeling that as our species evolves into one which may no longer act with anthropic arrogance towards the other components of our planet, both the biota and non-living, we must recognize that we can no longer decimate an area for pleasure or for economic gains only. I could state that I would like the four areas that your office is considering for wilderness protection set aside so that I may be able to backpack through them someday, undisturbed. However that would be arrogant of myself as a human to state that as my only reason to protect these areas. Rather, I feel that the fullest protection must be afforded these four areas for the ecosystems which they still support. We must go beyond the fullfilment of human wants and set aside these areas for ALL who use and visit them.

Hence, I request that your office recommend that the Clan Alpines # NV-030-102, the Stillwaters # NV-030-104, the Desatoyas # NV-030-110, and Job Peak # NV-030-127 be approved for "Wilderness" designation to the outermost boundries of the Wilderness study areas. I could also state that more should be included for each one, but time does not allow me to become specific. I duly submit my comments with the fullest sincerity.

Yours Truly,

Thomas Murarik
P.O. Box 13399
Reno, NV 89507

Comment Letter 34

RESOURCE CONCEPTS INC. ENGINEERING · ECONOMICS RESOURCE PLANNING

210 W. MARKET ST. · CARSON CITY, NEVADA 89701 · (702) 883-1600

December 30, 1983

Mr. Thomas J. Owen
District Manager
Bureau of Land Management
1050 E. William Street
Suite 335
Carson City, Nevada 89701

SUBJECT: N-3 State Grazing Board comments to the Draft Lahontan RMP

Dear Mr. Owen:

Resource Concepts, Inc., representing the interests of the N-3 State Grazing Board, provides the following comments to the Draft Lahontan RMP. The N-3 State Grazing Board would appreciate an answer to each specific question and a response to each recommendation presented in this letter. Included in these comments is the Board's recommended proposed action for the final RMP.

WILD HORSES

34-1 Page 2-11 of the RMP states that the Carson City BLM's preferred action is to manage wild horses within their current herd use areas. However, the BLM's Fourth Report to Congress, June, 1982 - Administration of the Wild Free-Roaming Horse and Burro Act states, "Wild horses and burros are to be maintained only in areas where the animals existed when the Wild Free-Roaming Horse and Burro Act became law on December 15, 1971".

Since the "Fourth Report to Congress" is mandated by the Wild and Free Roaming Horse and Burro Act and has been prepared in a manner suitable for Congressional review, the Board must assume that the BLM is required to manage horses within their 1971 distributions as opposed to the Lahontan RMP recommended 1983 herd use areas.

Question: Is the BLM's statement to Congress concerning the management of wild horses within 1971 distributions erroneous, or is the Carson City BLM District, with its preferred alternative, disregarding its agency's own interpretation of the Wild and Free-Roaming Horse and Burro Act?

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34-1 Since the wild horses have been totally removed from the Horse Springs Herd Area, the number of current herd use areas as specified in the preferred alternative is less than the number of 1971 herd use areas and all the areas well used by horses in 1971. Therefore the proposal is in conformance with the Fourth Report to Congress. Please refer to page 3-14 of the Draft for an analysis of the reasons for total removal.

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Mr. Thomas J. Owen, District Manager
Carson District
Bureau of Land Management
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34-2 Question: Based on the earliest available wild horse distribution maps for the Lahontan RMP area since 1971, have horse herd distributions expanded?

The RMP proposes a variety of range improvements under the various alternatives designed to improve wild horse habitat. Considering the BLM's 1984 range improvement maintenance responsibility policy, the Board is curious as to who will have maintenance responsibilities of wild horse habitat range improvements.

34-3 Question: Who will be charged with the maintenance responsibilities for range improvements designed to benefit wild horse habitat?

Page 4-11 of the Resource Protection Alternative indicates that there will be an improvement in condition and trend on ten M and C allotments partially due to "reduced yearlong use by wild horses."

34-4 Question: How can there be reduced yearlong use by wild horses when the Resource Protection Alternative advocates a 19 percent increase in wild horse numbers?

THREE YEAR AVERAGE USE AND INITIAL GRAZING LEVELS

34-5 The Preferred Alternative (p. 2-11) states, "Initially, authorize livestock use at the three-year average use level of 64,239 AUMs". The ensuing statement reads, "There would be no initial decisions to adjust active preference". The Board considers these conflicting statements. The first statement gives every indication that the Bureau fully intends to hold the permittees to their previous three year average licensed use. However, the second statement indicates that the permittees will be allowed to run livestock use up to active preference levels (as is currently allowed).

Question: Will the three year average livestock use be the required starting point under the Preferred Alternative, or is it presented in the RMP for "analysis purposes only"?

Recommendation: If the Bureau has used the three average use figure for "analysis purposes only", the Board recommends that a statement to this effect be included under the Preferred Alternative. In addition, the following statement taken from the Final Reno EIS, should be included in the "Implementation of the Resource Management Plan" section:

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34-2 There is no documentation of expansion of wild horses in the herd use areas in the RMP area. The delineation of the use areas is adjusted periodically to reflect improved data. It should be noted that the Carson City District has removed 1318 horses from the RMP area since 1977.

34-3 The Bureau will construct and maintain improvements for such use by wild horses with funds from its wild horse and burro appropriations.

34-4 Page 4-11 of the Draft RMP/EIS refers to the Horse Spring allotment from which horses have been totally removed. The overall 19 percent increase applies to other allotments in the RMP area.

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Mr. Thomas J. Owen, District Manager
Carson District
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34-5 The three year average use was used for analysis only and would not, or could not, be required as a stocking rate. Any permittee is free to activate his non-use at any time unless emergency conditions such as fire or flood were to preclude it. There is no basis to hold a permittee to the past three years active use, as this could be a reduction in preference and would require a District Manager decision with resultant appeal rights. There, of course, is no correlation between active use and proper stocking rate, and without proper data a reduction in preference would not stand up in court.

Question: If the Bureau actually intends to hold a permittee to his previous three years' average use during the short term period of the Preferred Alternative, what bearing does the previously presented excerpt from the Final Reno EIS have on this matter?

Page 2-13 of the RMP indicates that an initial level of livestock grazing must be established. However, the RMP fails to discuss why the establishment of an initial livestock use level is necessary.

Question: Why does the Carson City BLM consider the continuation of the present system (allow licensing up to active preference levels) inappropriate for initial implementation of the Preferred Alternative?

Question: If the Preferred Alternative is selected, will the initial level of livestock use be required to remain constant during the initial monitoring period? If so, why is it necessary to hold livestock numbers constant during the initial monitoring period?

Recommendation: The final RMP should provide a discussion as to why the licensing up to active preference is inappropriate in the Preferred Alternative and why an initial livestock level is necessary during the short term.

RESOURCE PROTECTION ALTERNATIVE

At this point in the RMP process, the Bureau supposedly does not know which alternative or combinations of alternatives will be selected as the final resource management plan. Consequently, the

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34-5 Please refer to Response 20-1.

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Mr. Thomas J. Owen, District Manager
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Board must assume that there is a definite potential for the Resource Protection Alternative to be selected as the final RMP. However, for the Bureau to implement this alternative would require there to be data to support the proposed reductions in livestock use.

34-6 Question: Why, according to the Resource Protection Alternative, is it necessary to reduce livestock AUMs on the Bass Flat, Lahontan, and Phillips Well Allotments when there is an upward trend in range conditions? Does the BLM contend that they have sufficient data to justify reductions on these allotments? Does the BLM concur with the N-3 Board that reducing livestock AUMs on allotments demonstrating an upward trend is imposing unnecessary economic hardship on permittees?

34-7 Question: With regard to the Resource Protection Alternative, does the BLM have the data to justify a 72 percent reduction in livestock AUMs on the Hole-In-The-Wall Allotment? Since livestock are not grazing during the critical growing season and wild horses are yearlong, doesn't it appear somewhat contradictory to the objectives of the Resource Protection Alternative to recommend increased utilization of forage during the critical growing season by allowing 19 percent increase in wild horse numbers? How was a reduction of 880 AUMs of livestock use determined for the Hole-In-The-Wall Allotment?

NO ACTION ALTERNATIVE

The objective of the No Action Alternative is to continue to manage the public lands as at present. NEPA requires that all the alternatives be thoroughly analyzed and indicates that each alternative be evaluated equally. This is necessary since at this point in the RMP process the Bureau does not know which alternative will be selected as the final plan. However, the Board contends that the Bureau has not accurately portrayed the existing situation. The RMP gives no indication that monitoring, selective management, or AMP development, is or will be a part of the No Action Alternative if selected as the final RMP. Page 2-13 of the RMP indicates that the final RMP will be implemented through activity plans (HMPs, AMPs, HMAPs, etc.), selective management, and vegetation monitoring. The No Action Alternative insinuates that none of these activities will occur under this alternative.

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34-6 Adjustments proposed under this alternative for the allotments listed were based on reduced periods-of-use for livestock and increased wild horse use. Current data (including trend data) is limited, but as the analysis in Chapter 4 indicates, these adjustments would maintain current upward trend on Bass Flat and Phillips Well allotments, but even with the downward adjustment of livestock grazing in the Lahontan allotment it is not expected that upward trend could be maintained. Please refer to page 4-21 of the Draft RMP for an analysis of the economic impacts of this alternative on permittees.

34-7 The adjustment proposed for the Hole-in-the-Wall allotment is based on increased wild horse and mule deer use. This is consistent with the objectives of this alternative. Please refer to page 2-1 of the Draft RMP which states that the Resource Protection alternative is oriented towards protection and enhancement of natural values with emphasis on wildlife and riparian habitats, wild horses, and wilderness.

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Mr. Thomas J. Owen, District Manager
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34-8 Question: If the No Action Alternative is selected as the final RMP, how will the guidelines for implementation (p. 2-13 through 15) be incorporated?

34-9 The BLM's final Grazing Management Policy states, "District Managers will develop a proposed action and an array of alternatives for each planning area and analyze them through the land-use plan and EIS. The alternatives, as well as the proposed action, should incorporate the features of selective management...." The Board interprets this policy to mean that selective management will be included for all alternatives. However, indications in the RMP are that selective management will not be a part of the No Action Alternative.

Question: Why has the Carson City BLM elected to go contrary to the BLM Director's Final Grazing Management Policy concerning selective management categorization?

34-10 In order for an adequate comparison of the alternatives to occur, as required by NEPA, the Bureau should have included range improvement costs in Table 2-1. This could have been done by showing the past three years' average costs of range improvements.

Question: Why were previous range improvement expenditures not shown for the No Action Alternative in Table 2-1?

34-11 Question: Why was monitoring excluded from the No Action Alternative? Have the Bureau not been monitoring for a number of years in Carson City District, and is monitoring not required by both State and National BLM policy? Assuming the No Action Alternative is selected as the final RMP, doesn't NEPA require that the final RMP be monitored?

HOLE-IN-THE-WALL ALLOTMENT

34-12 Table 3-8 indicates that the Hole-In-The-Wall Allotment is experiencing an "improper period-of-use" and that this is an allotment management problem. However, average livestock season-of-use on the Hole-In-The-Wall Allotment (11/1-3/15):

1) is comparable to the Phillips Well and Bass Flat Allotments' season-of-use (in which Table 3-8 did not identify season-of-use as a problem),

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34-8 Since the implementation section requires taking actions it does not apply to the No Action alternative. The wording on page 2-13 has been altered to make this clear. Please refer to the errata section of this document.

34-9 The grazing management policy requires taking actions in an RMP and therefore does not apply to the No Action alternative. Please refer to pages 2-1 and 2-2 which describe the No Action alternative. Briefly, it represents a continuation of present resource management and use levels.

34-10 NEPA does not require displaying the last three years average costs for range improvements. However, for information purposes, these costs have averaged $49,000 over the last three years.

34-11 Please refer to page 2-2 of the Draft RMP which states that existing management practices would continue—since monitoring is an existing management practice it would continue. The wording on page 2-2 has been changed to clarify that point. Please refer to the revisions and errata section of this document.

34-12 Table 3-8 refers to yearlong use by wild horses.

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Mr. Thomas J. Owen, District Manager
Carson District
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2) does not occur during the critical growing season of key species (p. 3-5, 3-7); and

3) corresponds to recommended Grazing Treatments 1, 2, and 4 (p. 2-14).

Question: Why was improper season-of-use identified as a problem on the Hole-In-The-Wall Allotment in Table 3-8?

34-13 Page 2-14 indicates that the implementation of the various Grazing Treatments will improve range conditions. According to the RMP, the implementation of Grazing Treatment #4 (defer grazing from April 1 to June 30) will result in "improved vigor and reproduction of key management species". The Board contends that the permittee has in effect followed Grazing Treatment 4 for a number of years already, but with no improvement in the range (Table 3-1 indicates a static trend).

Question: Since livestock have grazed the allotment during a favorable season-of-use for a number of years, why hasn't this resulted in an upward trend in range condition on the Hole-In-The-Wall Allotment?

34-14 Pages 4-11 through 4-16 and page 7-37 indicate that even with a 72 percent reduction in livestock AUMs and an implemented AMP, the Hole-In-The-Wall Allotment will deteriorate in trend, condition, and vegetative productivity.

Question: What will be the cause of a downward trend, deteriorating range conditions, and decreased productivity on the Hole-In-The-Wall Allotment if the Resource Protection Alternative is implemented?

Appendix G, Part 1 states "Present allotment trend was determined from results of trend studies which were conducted using the photo-plot measurement method described in BLM Manual 4412". Since NEPA requires that any methodologies used in an RMP be presented in the document, the Board must assume that the photo plot method was the only measurement used to base the "static" trend results indicated in Table 3-1 for the Hole-In-the-Wall Allotment. The Board is aware of only two photo trend plots on the Hole-In-The-Wall Allotment and the results of both of these plots do not indicate a static trend. Based solely on the results of these BLM plots the Hole-In-The-Wall Allotment is experiencing a downward trend. The results of these plots are:

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34-13 Data indicate that 84 percent of the allotment consists of low potential ecological sites. These sites respond very slowly, if at all, to changes in grazing management. Please refer to page 7-15 of the Draft RMP for more information on the basics of vegetation response potential.

34-14 The projected impacts of the Resource Protection Alternative on the Hole in the Wall allotment are due to use by all grazing animals. It should be noted that while this alternative proposes a reduction in livestock use it increases wild horse and mule deer use.

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Carson District
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Trend Plot I.D.	1977 (Trend Index)	1980 (Trend Index)	Trend Results
Hole-In-The-Wall #1	33.61 (100)	17.71 (52.7)	Downward
Hole-In-The-Wall #2	28.98 (100)	23.03 (79.5)	Downward

34-15 Question: If existing trend is based on the photo plot method (Appendix G) results, why is the Hole-In-The-Wall Allotment portrayed as being in a "static" or "no apparent" trend situation? Recognizing the BLM's concern for harmful effects of grazing during the critical growing season of key species (as discussed throughout the RMP), what is responsible for the downward trend results indicated by Hole-In-The-Wall photo trend plots #1 and #2?

34-16 On p. 3-15, the RMP states, "In some areas of the Clan Alpine, Desatoya Mountains, and Augusta Mountains Wild Horse Herd Use Areas, the combined number of animals are competing for the available forage and thus are causing a decline in desirable forage species. This lowering the quality of the wild horse habitat". The Board contends that "a decline in desirable forage species" is synonomous with a downward trend in range conditions.

Question: Considering livestock season-of-use and average livestock AUMs of use (1,222 AUMs) in comparison to wild horse use (1,740 AUMs) on the Hole-In-The-Wall Allotment, what is the major cause of the downward trend in range conditions within the Augusta Mountain Wild Horse Herd Use Area (as indicated on page 3-15)?

DATA ADEQUACY

34-17 Question: Why was wild horse use not used as a criteria in determining management impact in paragraph 2, page 7-15?

34-18 Question: Are there photo trend plots on all the allotments in the RMP area?

34-19 Question: How was trend data extrapolated over entire allotments (Table 3-1) from a limited number of trend plots?

34-20 Question: NEPA requires that all methods used in an RMP be presented in the document. What methods were used in determining livestock impacts to riparian areas?

RESOURCE CONCEPTS INC.

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34-15 Trend estimates in the Draft RMP/EIS were developed using four factors: 1) photo comparison first vs. last, 2) photo comparison first vs. all, 3) trend index summary, 4) trend narrative. Static trend was estimated for the Hole-in-the-Wall allotment since three of these four factors indicated static; only the trend index summary indicated downward trend.

34-16 Page 3-15 of the Draft RMP/EIS states that in portions of the Augusta Mountain Wild Horse Herd Use Area (HUA) there is a decline in desireable forage species. However, as indicated in Table 3-5 there is no apparent (static) overall trend. Since past studies did not differentiate use by livestock, wild horse, and wildlife it would be improper to state that the decline in desireable forage species in portions of the HUA is attributable to any one user. Studies have been initiated in the past year to differentiate use by livestock, wild horses, and wildlife.

34-17 Use by all grazing animals (specifically, period-of-use, level of utilization, and use distribution) was considered in determining management impacts. Page 7-15 has been modified to make that point clear. Please refer to the errata section of this document.

34-18 Photo trend plots are located in all allotments in the RMP area except for Mississippi and Hare Canyons which are managed as part of the Dixie Valley allotment and Dead Horse Well which is not adjudicated for livestock grazing.

34-19 Photo trend plots were installed in key areas representative of each allotment.

34-20 Please refer to page 3-9 of the Draft RMP/EIS which states that the source of the data on livestock impacts to riparian areas is the wildlife inventory. This inventory consisted of mapping, photographs, description of flora and fauna, water flow, resource conflicts, hazards, size, and needed improvements and/or protection of each site as directed in the Integrated Habitat and Classification System (BLM Manual 6602). This inventory was conducted from 1973 to 1979.

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Mr. Thomas J. Owen, District Manager
Carson District
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ECONOMIC ANALYSES

34-21 Page 3-28 sites Nielson and Workman (1971), in stating that grazing fees have historically been lower than fair market value. Further, the text states that permit value is attributable to the additional capacity that public land grazing allotments provide to base property.

These statements imply that permit values have developed only due to excess benefits accruing from the government to ranchers. In fact, in some areas of the west (i.e. the Southwest) permit values have been falling as determined by the Federal Land Bank.

Question: Is it not likely that portions of permit value are attributable to private investment on supporting base properties; risk and uncertainty; and other factors not considered by Nielson and Workman (1971).

Recommendation: Because Congress will be evaluating the existing fee formula in the near future, it is important that BLM and USFS do not present unfounded conclusions concerning subsidization of grazing permittees. If any discussion of permit value is to be included in the DEIS, it should consider all facets to permit value, and in particular the negative effect that ever changing agency grazing policies have on permit values.

34-22 Page 4-1 lists the assumptions included in analyses of the various alternatives considered in the DEIS. In addition, each alternative suggests that the success of its implementation depends in part upon the development and maintenance of range improvements. Yet nowhere within the DEIS are the added costs to the livestock industry of developing and maintaining proposed range improvements discussed. This is an extremely important omission in view of the new Rangeland Improvement Policy which effectively shifts the majority of all rangeland improvement maintenance costs to the livestock industry beginning in 1984.

Question: Why does the DEIS not consider or discuss the proposed action or alternatives thereto in light of the Bureau's Rangeland Improvement Policy as is required and 40 CFR 1502.14, subpart (C)? Have ranch budgets been modified to include higher costs for range improvement maintenance? The information provided in Table 2-1 of the DEIS should allow the inclusion of this data to the impact analyses.

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[illegible]

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34-21 The permit values can be affected by many factors including risk and uncertainty which affect the value of all goods, public and private. They can also be affected by range improvements on public lands, but are not comparable to the value of improvements on private lands for which legal title is exchanged. Permit values can be affected both positively and negatively by changes in public land grazing policies. This is a reflection of the fact that these lands are owned by the public and permittees do not obtain legal title when they purchase grazing preferences. The impacts of changes in grazing policies and management proposed in the Draft RMP are analyzed on pages 4-22, 4-36, and 4-48 of the Draft RMP. Further information on the relationship between grazing fees and permit value can be found in the professional literature on the subject, including the Nielson and Workman report referred to in the Draft as well as Godfrey, 1981; McConnen, 1976; and Gardner, 1962.

34-22 Range improvements have always been maintained by livestock permittees in the Lahontan RMP area. These costs are included in the economic analysis in the Draft RMP/EIS on a per head basis. They can be broken out separately. For example the average increase in maintenance costs is estimated to amount to four cents per AUM after full implementation of the Preferred Alternative. By comparison, the BLM has decreased grazing fees by 99 cents/AUM between 1980 and 1984. This decrease has helped ranchers offset the increase in other costs, including maintenance. It should be noted that

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Recommendation: It is recommended that the analysis of impacts resulting from the proposed and alternative actions be reconsidered in light of the Bureau's RAngeland Improvement Policy. While it is recognized that a base year was needed for analysis purposes, management decisions formulated on the basis of the DEIS must be based upon as up-to-date information as possible. In its present state the DEIS assumes that the alternatives are all implementable when in fact permittees may be unable or unwilling to incur additional costs for range improvement maintenance associated with proposed range improvements.

34-23 Summary Table 2 provides a comparative review of the significance of indirect impacts to social and economic consequences. 40 CFR 1502.16 requires that the direct effects and their significance be discussed.

Question: How significant will the direct short and long term economic impacts to grazing permittees be?

Recommendations: Expand Summary Table 2 to include presentation of significance of direct economic impacts to existing grazing permittees.

34-24 The severity of short term economic impacts potentially accruing to current permittees through implementation of all but the No Action Alternative may result in ranchers going out of business. The DEIS does not carry the analyses of impacts far enough to allow a determination of the possible number of ranchers going out of business to be made. The DEIS appears to discount the significance of short term negative impacts in favor of the prospects of long term positive benefits. The DEIS appears to suggest that short term economic impacts, which may force operators of business, are justifiable in order to improve rangeland condition. This logic raises several questions.

34-25 Question: If an existing ranch operator is forced to sell out because the unit is no longer economically viable, will the new operator be as good a steward of the public range resource? Because the success of the Bureau's rangeland management program is heavily dependent upon the stewardship of the user, the answer to the aforementioned question is critical to the evaluation of each alternative.

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many range improvements require little or no maintenance costs and can substantially reduce other costs. For example, the Carson City District has initiated a cooperative effort with livestock permittees and the Army Depots at Hawthorne and Herlong, to obtain surplus railroad fuel cars and jet engine containers for use as livestock water storage tanks and troughs. These facilities require little or no additional maintenance costs and not only improve livestock distribution and provide for utilization of unused forage but also can substantially reduce labor costs. Benefit/cost analyses with detailed sight specific maintenance costs will be prepared at the activity planning stage of this process as specified in Standard Operating Procedure #6. Please refer to page 2-16 of the Draft.

34-23 Please refer to the social and economic impact sections starting on pages 4-8, 4-21, 4-35, and 4-47 of the Draft RMP/EIS for an analysis of direct effects and their significance.

34-24 Please refer to pages 4-22 and 4-36 of the Draft RMP/EIS which state that long term benefits would not offset short term losses. It should be noted that other than in the Resource Protection alternative, the only projected short term losses are the result of a worst case analysis of possible future land disposals. In the absence of these disposals, no negative short term impacts would occur and ranchers would benefit from the improved livestock distribution, additional water sources, and increased vegetation production resulting from implementation of range improvements and grazing systems. Therefore it would be highly unlikely that any ranchers would decide to sell their ranches.

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34-25 Because a non-economically viable ranching unit may be purchased for other than the units ability to produce AUMs, range management may no longer be a goal or priority by unit operators. This situation could jeopardize previous investments of both public and private monies in rangeland improvements.

Where DEIS alternatives will likely result in the sale of certain ranching units, has the Bureau considered how a ranch sale would help or hinder effective range management?

Recommendation: The Bureau should include analyses of the effects of ranch sales upon its ability to actually achieve long term goals associated with each alternative.

34-26 Page 2-17 states that, "maintenance of structural improvements shall be provided by the user deriving the primary benefit from the improvement through cooperative agreements and as specified in the Bureau's 1982 Rangeland Improvement Policy". This statement is presented as a means of mitigating impacts.

Question: How can incurrence of 100 percent of maintenance costs by a livestock operator for an improvement in which as little as 51 percent of any benefits accrue to same operator be considered mitigation, particularly when the operator may be forced to agree to the improvement rather than face a reduction in available AUMs?

FINAL RMP

As indicated in the Draft RMP, the Final RMP may be any of the alternatives or a combination of the alternatives. Supposedly, the final RMP selection will be influenced by the public's comments to the Draft RMP. The N-3 State Grazing Board recommends that a combination of the Preferred Alternative and the Commodity Production Alternative be selected as the final RMP. The N-3 State Grazing Board's recommended Final RMP includes the following points:

1) Livestock would be licensed at existing levels during the short term. Permittees would be allowed the flexability to license livestock use up to active preference, however, during the short term license use would probably not greatly change from the past three years' average use. Three year average licensed use would be used only as an analysis figure. Long term livestock numbers will be established through the aid of monitoring results.

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34-25 It would not be appropriate to speculate about the relative abilities or motivations of individuals who may or may not purchase ranch properties at some point in the future. It is fortunate that in the Lahontan RMP area most of the ranchers are good range managers. This includes many of the newer arrivals as well as the more established ranchers.

34-26 Having parties who derive direct and significant benefits from range improvements pay for their maintenance results in releasing more public funds for construction of new range improvements. Permittees are not compelled to agree to range improvements which they do not find to be economically advantageous.

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2) Wild horses would be reduced on all herd use areas (as recommended in the Commodity Production Alternative) except in areas where this level would be less than 50 head. Horses will be managed at a minimum level of 50 head in existing herd use areas.

3) Initially manage habitat for existing numbers of big game, while recognizing reasonable numbers as a management goal.

4) Other management activities would be the same as presented in Draft RMP's Preferred Alternative.

34-27 If the Bureau finds this combination of alternatives as unsuitable for the final RMP, please discuss your reasons why in the Final RMP comment responses.

CONCLUSION

The N-3 State Grazing Board would welcome the opportunity to discuss these comments in person prior to the formulation of the Final RMP. We are anxious to see what changes in the Draft RMP will incur as a result of our comments as well as those of others. The Board appreciates the opportunity to comment and trust that that these comments will result in improvement to the Draft RMP.

Sincerely,

John L. McLain
Certified Range Management Consultant

JLM:dh
cc: N-3 Board Members

RESOURCE CONCEPTS INC.
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Response Letter 34

34-27 This alternative was not selected because it does not conform to the concept of multiple use as well as the proposed resource management plan, specifically for wild horses.

THE CLEVELAND MUSEUM OF NATURAL HISTORY

WADE OVAL, UNIVERSITY CIRCLE
CLEVELAND, OHIO 44106
(216) 231-4600

December 30, 1983

Mr. Thomas J. Owen, District Manager
U.S.Bureau of Land Management
1050 E. William Street, Suite 335
Carson City, Neveda 89701

Re: Clan Alpine Mountains (NV-030-102), Stillwater Range (NV-030-104), Desatoya (NV-030-110), Job Peak (NV-030-127) Wilderness Study Areas

Dear Mr. Owen:

One of the major concerns of our Museum is the preservation and study of the natural environment. Areas where the effects of man are subordinate, i.e., wilderness are fast disappearing in the United States and around the world. The Museum favors preservation of these areas wherever practical. Each of the four Wilderness Study Areas in the Lahenton Reserve Area was found to have high wilderness values and characteristics during the intensive Wilderness Inventory. As such, these areas are worthy of protection unless there is a management or mineral/energy conflict so massive that the area cannot be managed as wilderness. Management conflicts are minimal because of low population density and low recreational use. There is no mineral or energy production currently in any of the Wilderness Study Areas. Questions of the potential for such production should be left to the professional expertise of the USGS and USBM in the next inventory phase.

Three of the areas contain unique ecosystems. These are Clan Alpine Mountains and Oesatoya Wilderness Study Areas which have mountain mahogany-oak scrub ecosystems. These ecosystems are nowhere else in the National Wilderness Preservation System. It is essential that the greatest protection and acreage possible be given these two areas. The Job Peak Wilderness Study Area is sacred ground to native Americans and also contains a reintroduction of Desert Bighorn Sheep which require solitude and protection which should be provided.

Please include these concerns in the official record of public comment on the draft Wilderness Environmental Impact Statement. Please keep us informed of any further actions concerning wilderness in the District. Any response by BLM or others to this comment would be appreciated. Thank you.

Sincerely,

Harold D. Mahan

Dr. Harold D. Mahan
Director

HDM:hy

Comment Letter 36

A 34 page letter was received from Mr. Paul C. Clifford Jr. of 2955 Berkshire St., Cleveland Heights, Ohio who is employed as Curator of Mineralogy at the Cleveland Museum of Natural History. Due to prohibitive printing costs excerpts containing substantive comments, rather than the entire letter, have been included in this document pursuant to Council of Environmental Quality Regulation (40 CFR 1503.4(b)). Those excerpts follow.

36-1 It is also my understanding that decisions in California RARE II disputes as applied to WSAs and Interior Board of Land Appeals decisions in Utah mandate that only man generated imprints arising within a WSA are to be considered. Imprints such as noise and view impairment arising outside the area are not to be considered. Minor imprints such as range improvements do not disqualify an area.

36-2 P. 3, 4 - As BLM chose to include the wilderness considerations with the RMP they must still justify (document) why the preferred alternative is better, particularly since it is so different from the Mid Range alternative.

36-3 BLM is required at present to manage all WSAs to preserve wilderness values under existing IMPs. Management is an active endeavor according to my dictionary and involves manipulation to achieve the desired goals. Removing all substantial parts of a WSA based on potential illegal vehicle trespass on a scale so trivial as described above is not management of wilderness but active abetting of the destruction of it which is forbidden by the IMP. As such, these reductions in size are themselves illegal except in areas of overwhelming impact. These exceptions are very, very rare in the 4 WSAs.

Response Letter 36

36-1 During the wilderness intensive inventory the effect which outside sights and sounds may have upon wilderness characteristics inside an inventory unit was not to be considered.

The Wilderness Study Policy clearly states, however, that outside sights and sounds "...may be taken into account in assessing the quality of an area's naturalness or its opportunities for solitude or primitive recreation". (Federal Register, Vol 47, No. 23, p. 5105)

36-2 The Wilderness Intensive Inventory identified those areas which had the mandatory wilderness characteristics of size, naturalness and outstanding opportunities for either solitude or primitive and unconfined types of recreation. The determination of an area's suitability or unsuitability for designation as wilderness was to be made as a result of the wilderness study process.

Development of the Preferred Alternative for the wilderness issue was done in compliance with the Bureau's Wilderness Study Policy and all pertinent regulations and instruction memorandums. This included a thorough consideration of the quality of each area's wilderness characteristics, the manageability of the area, and existing and potential resource conflicts.

36-3 Manageability of each WSA was carefully assessed in the Lahontan Wilderness Technical Report. The potential for off-road vehicle management problems was only one of several concerns addressed in that section of the report and was never used as the sole reason to eliminate a portion of an area from further wilderness consideration.

Comment Letter 36

36-4 BLM evaluations apparently rely heavily on the "GEM" Report for their technical base, although this is never clearly stated. There is no summary of methodology or findings of the report nor is it included in the WTR or EIS even "by reference." In fact only the most tantalizing tibits are excerpted from the GEM report. There is not even a statement that the standard BLM "Potential and Confidence Scheme" (Table II) is the basis for terminology of potential and confidence. I can only assume that it is.

As the WTR and EIS apparently rely heavily on the GEM report respondents like myself have been deliberately denied the data necessary to evaluate either the GEM report or its interpretation by BLM. The "analysis" given the in WTR and EIS is actually unsubstantiated opinion (from the point of view of one evaluating the WTR or EIS). As a result I cannot accept as valid any of the claims of high or moderate mineral or geothermal evaluations, based on evidence presented in the WTR or EIS. For all practical purposes no data is given. We must therefore rely totally on the USGS and USBM evaluations which have not yet been done.

Response Letter 36

36-4 The evaluation of energy and mineral potential found in the RMP and Wilderness Technical Report (WTR) is based largely on the findings of the GEM Resource Area Technical Reports prepared by Great Basin GEM Joint Venture. These reports were prepared under BLM contract to provide a basis for recommendations on geology, energy, and mineral issues. Frequent reference to these reports in the RMP and WTR reflect their intended use. References have been added to statements about mineral potential. Please refer to the revisions and errata section of this document.

An explanation of methodology and a summary of findings for reference material is not customarily included in the text of a technical report, therefore, this information on the GEM Reports was purposely omitted. The public is invited to review and copy these documents which are available at the BLM Denver Service Center, BLM Nevada State Office, Nevada Bureau of Mines and Geology, and the BLM Carson City District Office.

Comment Letter 36

36-5 The "evaluations" provided in the WTR and EIS are very general and do not relate to specific verifiable areas. They are therefore not "site specific", again making it impossible to evaluate their accuracy or suitableness on a site specific basis. As a result the "Energy and Mineral Resource Values (Quality Standard 1) has not been "fully considered and documented in determining whether a WSA is more suitable for wilderness or for other uses and in making all BLM wilderness or for other uses and in making all BLM wilderness recommendations, both "suitable" and "nonsuitable" (EIS p. 7-28, emphasis added). The EIS is therefore severly if not fatally falwed as regards the matter of wilderness because the Wilderness Study Policy and Planning Criteria have not been met.

Response Letter 36

36-5 The energy and mineral evaluations in the GEM reports relied on a wide range of existing data, some specific, some general. Analysis of this data resulted in the delineation of areas of mineral potential at varying degrees of confidence. The confidence scheme reflects the quantity and quality of data available. These areas are discrete, identifiable map units well documented in the WTR and/or GEM reports. The data and analysis which established these areas is verifiable.

Comment Letter 36

36-6 In almost every instance the ratings and confidence levels as interpreted from the GEM report appear to be highly inflated. It is unclear to me if they assigned the potential and confidence levels or if these were done by BLM. In any event, the problem is in the deliniation of expectations associated with the moderate and high categories of potential. These I am sure were supplied by BLM. As I interpret the EIS, the BLM would have the reader believe that the moderate level of potential has at least a 50% chance of producing a quite significant amount of ore, say some millions of dollars profit, at least. The high potential is held to be essentially a surety of producing a high tangible monetary return. Nothing could be further from the truth.

The use of the terms low, medium and high potential with regard to any liklihood for the production of ore at a profit has been completely misapplied in the EIS. The classification and confidence scheme used by BLM is workable if the proper data is used. Such proper data was neither supplied nor applied to support this scheme at the moderate or high levels for mineral potential or confidence proposed in either the Technical report or the EIS.

36-7 P. 8 - Geochemical and geophysical anomalies may be considered together. I know of no geophysical prospecting work which has been done for minerals as opposed to energy values on a site specific scale. No data is presented in the reports.

36-8 P. 10 - A high value anomaly in a geochemical survey is definitely worth a look but does not translate into even a "moderate favorability for the accumulation of resources." To state that it does is a gross inflation of the real potential of an area to actually produce mineral wealth.

Response Letter 36

36-6 The low, medium, and high ratings refer to the favorability for the accumulation of mineral resources. There is no quantifiable connection between this rating and the value of the mineral resource present.

36-7 The use of existing geophysical work in the GEM analysis was encouraged. However, when the information was not available the contractor was not required to perform independent surveys.

36-8 The presence of geochemical anomalies and other geologic indicia were used to rate a portion of the Desatoya WSA as moderately favorable for the accumulation of metallic minerals. Nowhere was a moderate geochemical anomaly related directly to a moderate favorability rating.

Comment Letter 36

36-9 There must be another option in the potential classification scheme. Number 2 states that "the geologic environment and inferred geologic processes have a low favorability for accumulation of mineral resources." Number 3 states that "the geologic environment, the inferred geologic processes, the reported mineral occurrences and the geochemical and geophysical anomalies indicate moderate favorability for accumulation of mineral resources." There is an absolute necessity for a classification between the two (here called "2A") stating "the geologic environment and the inferred geologic processes are generally favorable for the accumulation of mineral resources, but the verifiable reported mineral occurrences, the geochemical and geophysical anomalies, do not indicate that economically exploitable accumulations of mineral resources have occurred."

36-10 Oil and gas potential is bimodal in the Lahontan WSAs. There is valley fill, and various portions of all four WSAs centered on mountain masses. The geologic history of the region essentially precludes economic concentrations of oil and gas in the mountain masses. The conditions above are simply not met. The mountain masses do not end at the topographic break in slope we now observe, but rather they are bounded by faults which may be some distance, often a mile or more toward the valley from the topographic break in slope. This means that the valley edges generally belong to the geologic province of the mountains and hence have a very low potential for oil or gas production.

Response Letter 36

36-9 Though not specifically stated in the classification scheme the absence of a geochemical or geophysical anomaly is considered under level 1 and 2.

36-10 The number of leases and total acreage under oil and gas leases in each WSA was included in the Technical Report in order to accurately show the current situation in these areas with regard to this activity. The mineral potential map and the discussion of the mineral potential for each WSA assesses the potential for actually locating these resources under the lands in question. With the exception of some areas with moderate potential along the alluvial fans in the Job Peak WSA, the remainder of the four areas are believed to have little if any oil and gas potential. This was taken into consideration in the development of the Preferred Alternative.

Comment Letter 36

The fact that these areas are leased for oil and gas has no significance except to show that the government is very shrewed about such leases. Leasees pay a set fee by the acre for the entire lease whether or not particular areas within the lease have high or low potential. Often as much land of low or no potential is added to a lease as the traffic will bear. This happens under the guise of keeping neat boundaries, like township lines, etc. If you want the good you take the bad as well. This has two profitable effects from the government's point of view. First, otherwise unleasable land is leased at the same rate as higher potential land. Second, more allotments of the same general size can be leased. Both of these make the leassor (BLM) look very good. The oil and gas leases in all of the WSAs essentially fall into this category and should not be considered further.

36-11 P. 15 - The EIS implies a great adverse economic impact due to wilderness designation due to withdrawal of WSAs from mineral entry. This is totally unwarranted. No larger mines employing a number of people are anticipated in any WSA since overall projections are that there would be no significant changes in area or local economies whether designated wilderness or not. One cannot claim an economic loss or a potential resource that has not been identified, quantified, or even staked with a mineral claim.

Response Letter 36

36-11 The science of economics deals extensively with the subject of opportunity costs. One of the opportunity costs of wilderness designation is a reduced potential for mineral development. The Draft RMP/EIS correctly identifies this as an economic impact.

Comment Letter 36

36-12 Wilderness designation is said by the EIS to adversely impact capital value of grazing allotments due to increased costs in those areas of 7 cents per AUM based on a USDI survey in Oregon. These figures are not applicable in the Lahontan RA because the Oregon study presumed 1) that all service to livestock and range improvements were done by vehicle prior to designation; 2) that all such service after designation was done by horseback or on foot. These conditions are not met in the 4 WSAs. In the Mid Range alternative permitees are specifically allowed to service range improvements by use of roads and ways closed to the public. Virtually all range improvements in the WSAs are adjacent to such access. The remainder of the areas is essentially not suitable for vehicular use before or after designation. As a result the presumed increase is vanishingly small and may well be offset by a reduction in vandalism. Therefore there is no economic impact to capital value of grazing allotments due to wilderness designation in these WSAs.

Response Letter 36

36-12 Neither the Mid-Range alternative nor any other alternative specifically allows permittees to service range improvements by use of roads and ways closed to the public. Should an area be designated wilderness, all ways would be closed and all roads would remain open.

Recommendations were made in the Lahontan Wilderness Technical Report that the use of certain roads be restricted to the permittee, landowners who require access to private inholdings and the BLM for administrative purposes. These are only recommedations and would be addressed in detail at the time a management plan is developed for a designated wilderness area.

The Oregon study was used in compliance with Council of Environmental Quality Regulations (40 CFR 1502.22) which require a worst case analysis when data is incomplete or unavailable. It should be noted that despite the use of a worst case analysis the greatest potential reduction in grazing permit value would amount to only two percent.

Comment Letter 36

36-13 No active mines of significance are located within the WSA. Exploration areas in Bernice/Hoyt Canyon, Dyer Canyon, Tungsten Mountain and Florence Canyon have been separated in the MRA which is correct. The use of the term deposit for the occurrances of metallic minerals known in the WSA is unwarrented. A deposit implies ore which can be produced at or near a profit. No such ore is known in the WSA. Potential for development within the WSA as modified in the MRA is not good as stated in the WTR (p. 32) but only fair and then in areas on the periphery of the WSA where impact would not be severe for core wilderness values. Only about 600 acres of "high" metallic potential remain in the MRA suggested area mostly immediately east of Hoyt Canyon area. No documentation is provided in the EIS to substantiate the claim that the remainder of the area has "moderate" potential on even a general area let alone site specific basis. A "moderate" rating is not warrented. A rating of "2A"-B is appropriate generally favorable geology - no supporting evidence from occurrances or surveys -low confidence due to lack of data.

Response Letter 36

36-13 The use of the words mineral deposit is made in accordance with the definition found in the American Geological Institute "Glossary of Geology": Mineral deposit: a mass of naturally occurring mineral material, e.g. metal ores or nonmetallic minerals, usually of economic value.

The WTR does not describe the mineral potential of each alternative, therefore, the statement made regarding the potential for development is accurate as it relates to the All Wilderness alternative.

The documentation for the moderate rating is found within the Clan Alpine Mountains GEM Resource Area Technical Report (GRA- No. NV-05). This rating is predicated on: 1) proximity to known mineral deposits (areas classified 4D); 2) similar geologic environment as the known mineral deposits; 3) intrusive activity; 4) abundant mining claims; and 5) structurally complex.

Comment Letter 36

36-14 There are no resource conflicts in the WSA which would justify a reduction in acreage. The greatest is a weak geochemical anomaly in the Cedar Creek-Topia Creek area. A follow-up survey confirmed the weak anomaly. This weak anomaly is the only reason for withdrawing approximately 8200 acres in this area. A potential for the profitable extraction of mineral wealth is not indicated by this type of anomaly and does not justify the exclusion of this acreage (see general comments). The area should be restored and W-10, W-11 closed.

Response Letter 36

36-14 Both the geochemical anomaly and the structural setting were cited in the GEM Report as a basis for the moderate rating.

The weak anomaly, combined with the existence of W-10 and W-11, private inholdings along R-12, range improvements in the immediate area and potential manageability problems, were the reasons 8200 acres in the northeast part of the unit were deleted. This anomaly was only one of several factors which contributed to the decision to delete this portion of the WSA from further wilderness consideration.

Comment Letter 36

36-15 The portion of the WSA immediately around Poco and West Job Canyon has a moderate metallic mineral potential. The remainder of the WSA has a "2A"-B classification, i.e., generally favorable geology - occurrances and studies do not indicate a commercial accumulation of minerals - low confidence due to lack of data; not moderate as stated in WTR.

Response Letter 36

36-15 The moderate rating was based on the following as reported in the GEM reports:

1. These volcanics are younger than the known mineralization to the north in the Stillwaters. Therefore the nature of the underlying mineral potential should be based on exposures where these volcanics are eroded away.

2. Mineralization is found in the underlying Mesozoics to both the north and south.

3. The presence of intrusive granitic rocks which are known to be associated with mineralization to the north in the I.X.L. district is significant. At depth where this intrusive is in contact with the underlying Mesozoic rocks there may be some depositionally favorable horizons that have been mineralized.

4. There are abundant mining claims in this classification area. Anaconda alone has approximately 250 claims in the volcanics of this classification area, the majority of which are within the WSA. The claims were staked on precious metal-bearing veins with wide zones of epithermal alteration. Sulfide mineralization associated with intrusives also reportedly occurs in this area (Delong, 1983).

Comment Letter 37

DEPARTMENT OF THE NAVY
WESTERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
P.O. BOX 727
SAN BRUNO, CALIFORNIA 94066

IN REPLY REFER TO:
20E:DNS:ea
Ser P3-244
17 JAN 1984

Mr. Thomas J. Owens, District Manager
Bureau of Land Management
Carson City District Office
1050 East William Street, Suite 335
Carson City, Nevada 89701

Dear Mr. Owens:

Reference is made to your request for comments on the Draft Resource Management Plan and Environmental Impact Statement (EIS) for the Lahontan Resource Area, Nevada.

As one of our functions, this office provides planning support services to Naval activities in the nine Western States and includes the review and assessment of proposed local, state and federal agency planning efforts for compatibility with Naval operations and development plans. Accordingly, we have reviewed the referenced EIS and submit the following comments for your consideration in the preparation of the Final EIS.

In general, we find the Draft EIS well prepared but take exception with certain issues as follows:

Land Disposal:

37-1 The Draft EIS identifies lands suitable for disposal from federal ownership to other public agencies or private individuals, but incorrectly includes lands which are under application for withdrawal at the Naval Air Station (NAS) Fallon B-2D Target range. The Draft EIS should be corrected on this issue throughout its text. It is also suggested that Chapter I, page 2, paragraph 7 should be expanded to clarify that lands identified as suitable for disposal would first be subject to a screening process by other federal agencies for possible transfer prior to disposal.

Microwave Radar Sites:

37-2 Chapter 3 of the Draft EIS incorrectly identifies five right-of-way easements as under application. Due to recent events, these easements have been approved and are now part of the existing conditions; Table 3-9 on page 3-20 and the the text relevant to these easements and the associated microwave radar sites should be corrected throughout the DEIS. Also, description of the easements and radar sites related to the Desatoya Mountain and Job Peak Wilderness Study Area (WSA) are missing; they should be inserted on pages 3-22 thru 3-24.

Response Letter 37

37-1 The filing of an application for a withdrawal does not in itself prohibit the identification of public lands for disposal within the proposed withdrawal. However, the application or an actual withdrawal, while in existence, would eliminate the disposal operations.

Prior to the disposal of lands so identified, all interested parties, including local government, are contacted. Only if interest from a federal agency had been previously expressed for the particular lands or if the lands were in a close proximity to another agency operation would such agency be contacted. The screening of all disposals by other federal agencies is not required, and is not considered a necessary part of the disposal process.

37-2 Please refer to the revisions and Errata section for additions and changes to Table 3-9 and text.

Comment Letter 37

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Ser P3-244

Compatibility With Navy Land-Use Plans and Policies:

37-3 The Draft EIS does not adequately address the compatibility or conflict of the proposed action with Navy land-use plans and policies. In general, we concur with your overall assessment that the effect of existing military training operations associated with NAS Fallon on WSA criteria and solitude values would tend to be localized, infrequent and of short duration. Further, since special provisions of the Wilderness Act of 1964 may permit the continued use of aircraft within lands ultimately designated as wilderness areas, we also conclude that existing overflights and military training operations over lands designated as wilderness areas are compatible. However, this permission is discretionary with the Department of Interior and/or may be subject to restrictions; it therefore causes us concern relative to restrictions that may be imposed which could impact existing and long established military training operations conducted by Naval Air Station, Fallon.

37-4 Any restriction that could negatively affect the mission, goal and operation of any military activity is considered a significant adverse impact and in serious conflict with Navy plans and policies. These issues should be furthur analyzed in order to provide adequate technical analysis of existing and planned land-use relationships pursuant to the National Environmental Policy Act (NEPA) requirements and the manageability criteria of the wilderness study process. Correspondingly, we believe that additional "reasonable" alternatives and/or the appropriate mitigating measures could resolve these issues and should be developed and further addressed in the EIS and the Public Record of Decision. Specifically, we request either the modificaton of wilderness alternative boundaries or the pre-development of appropriate sections of the Wilderness Management Plan for each WSA in order to ensure that all alternatives would not adversely impact or conflict with the operations of Naval Air Station, Fallon.

In conclusion, the Navy acknowledges the value of the wilderness program and supports efforts to designate lands considered most appropriate as wilderness areas. However, the Navy must strongly oppose the proposed action, as described, as it may result in potential adverse impact to the mission, goal and operation of NAS Fallon.

Sincerely,

J. E. HEATH
CDR, CEC, USN
Head, Facilities Planning
and Real Estate Department

-2-

Response Letter 37

37-3 The RMP adequately addresses impacts which existing and proposed NAS Fallon operations will have on Bureau activities, including recommended wilderness designations.

Although it is conceivable that Department policy could change, the provisions of the Wilderness Act of 1964 and the long history of military training operations conducted in this area, combined with both the Bureau's and the Navy's estimations that existing military operations are compatible with wilderness designations, would tend to dictate against any restrictions being placed on present air operations.

37-4 The Lahontan Wilderness Technical Report addresses the issue of increased air operations on the suitability of lands in the Lahontan Resource Area for designation as wilderness, including impacts upon the manageability of those lands. The Bureau cannot adequately address the impact of wilderness designations upon Navy plans and policies, however, since the full extent of Navy proposals will not be known until the EIS on the planned Supersonic Operating Area is released.

Pre-development of any portion of a wilderness management plan prior to Congresssional consideration of wilderness recommendations would be both inappropriate and premature. The Wilderness Act and the Wilderness Management Policy both provide general guidance with regard to aircraft overflights. A full range of alternatives was addressed in the RMP.

Comment Letter 38

ASARCO

January 3, 1984

Exploration Department
Great Basin Division

Mr. Edward F. Spang
State Director
Bureau of Land Management
300 Booth Street
Reno, Nevada 89520

Dear Mr. Spang:

We at ASARCO appreciate the opportunity to express our opinion on the Lahontan Resource Management Plan. After reading the provided draft and technical report on the Lahontan RMP, it is our choice that the 'no action' alternative be applied in future land use decisions. ASARCO has at this time active exploration programs in all areas designated in the Lahontan RMP and advocates keeping these areas open for present day and future mineral exploration.

The Great Basin Province is one of the most diverse mineralogic provinces in North America. Due to this diversity of mineral environments and the large size of the province, it offers outstanding potential for hosting economic mineral deposits. Geologic ideas, interpretations, and observations are constantly evolving, bringing new economic potential to the greater than thirty mining districts encompassed by the Lahontan RMP. It is our feeling that withdrawing all or part of the land specified in the Lahontan RMP would restrict or prevent present and future economic evaluation on both the individual and corporate level.

Once again, we would like to thank you for the opportunity to express our opinions on the Lahontan Resource Management Plan, and to advocate the implementation of the 'no action' alternative.

Sincerely yours,

Barney E. Mason
Geologist

cc: Mr. W. L. Kurtz
Mr. F. T. Graybeal
Mr. P. G. Vikre

ASARCO Incorporated
510 East Plumb Lane
Reno, NV 89502
(702) 826-7007

Comment Letter 39

Nevada Cattlemen's Association

414 Railroad Street · Elko, Nevada 89801
(702) 738-9214

OFFICERS
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Clover Valley, Wells
Dave Secrist
Elko
E.E. (Red) Eyre
Eureka

January 13, 1984

Mr. Thomas J. Owen
District Manager
Bureau of Land Management
1050 E. William St., Suite 335
Carson City, NV 89701

Dear Mr. Owen,

On behalf of the Nevada Cattlemen's Association I would like to provide the following comments on the Lahontan RMP/E.I.S. I realize your published deadline was January 3, 1984, but I hope you will consider these comments anyway.

We have received the N-3 State Grazing Board's comments on the draft plan as prepared by the firm Resource Concepts, Inc. We agree with nearly all their comments, questions, etc., with the possible exception of the numbers of wild horses that should remain in the HMP's. We strongly support managing the wild horse herds at the 1971 levels unless their numbers were excessive at that time. Fifty head minimum may, in some areas, be in excess of 1971 levels. With this one exception, we give support to these comments on behalf of the N-3 State Grazing Board and ask that we receive a copy of BLM's response to them.

Thank you,

Paul Bottari
Executive Secretary

PB/cm

AFFILIATE NATIONAL CATTLEMEN'S ASSOCIATION

Comment Letter 40

THE STATE OF NEVADA

EXECUTIVE CHAMBER

Carson City, Nevada 89710

February 6, 1984

Tom Owen, District Manager
Carson City BLM District Office
1050 East William Street, Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

We have reviewed the draft Lahontan Resource Management Plan and Environmental Impact Statement. Thank you for allowing us the opportunity to comment. The Resource Management Plan deals with a variety of issues and uses relating to the BLM lands within the resource area; however, at this time, this comment is specifically on the wilderness study areas considered in the document.

You may have already received comments from various state agencies representing their specific concerns with each area. I hope you find these informative and useful. Because the various state agencies are given different mandates and have different concerns, their evaluations and comments may understandably vary.

I have asked the various State agencies to work with my office to develop a consensus position for the wilderness study areas in the Lahontan Resource Area. These agencies were the State Department of Agriculture, Conservation and Natural Resources, Minerals and Wildlife. The State's position is based upon information provided by the BLM, the State's knowledge of the resources and attributes of each area, the concerns expressed by local government officials and concerns presented by the general public.

Job Peak (NV-030-127): This area has substantial mineral and geothermal potential which could be adversely impacted by wilderness designation. It may also be increasingly subjected to military overflights. On balance it lacks wilderness values that are high enough to compensate for the resource conflicts. We concur with your preferred alternative and find that this area should not be considered further for wilderness designation.

Stillwater Range (NV-030-104): This is an area which contains extensive moderate-to-high mineral and geothermal development potential. Active mineral exploration and mining claims in and around the wilderness study area substantiate this rating. The limited wilderness values present are outweighed by the mineral and geothermal values found within the area. The no action alternative, which is also preferred by the BLM, is appropriate for this area.

40-1 Desatoya (NV-030-110): This area has the highest wilderness values of the four Wilderness Study Areas in this planning area. While local governments do not support any of these four areas as wilderness, they do concur that the Desatoyas would be the most suitable of the four. We do feel that the boundary should be adjusted to exclude the historic mining activities near Carroll Summit (portions of Section 7 and 8, Township 16 North, Range 38 East). With this adjustment, the State supports the preferred alternative for designation.

40-2 Clan Alpine (NV-030-012): This area has high resource values which alone outweigh the limited wilderness values that may be present. Roads, ways, mining activities, and other impacts of man such as numerous military overflights further diminish the wilderness qualities present. The State recommends that the area not be considered for wilderness designation.

The State appreciates the opportunity to comment on your study. We urge you to consider carefully the concerns of the State and the local units of government in your continued review. Please do not hesitate to contact this office or any of our State agencies if you need additional information.

Sincerely,

RICHARD H. BRYAN
Governor

RHB/cjr

40-1 All of the areas of historic mining activity in the vicinity of Carroll Summit which have experienced actual physical impacts have been eliminated from the Preferred Alternative for the Desatoya Mountains WSA. The mineral values of this area will be carefully assessed by the U.S. Geological Survey and the Bureau of Mines before the Secretary of Interior makes his final recommendation to the President as to the area's suitability for preservation as wilderness.

40-2 Both wilderness and mineral resource values are high in the Clan Alpine Mountains WSA. The Preferred Alternative eliminates the great majority of range, woodland, ORV, and mineral resource conflicts, while recommending as suitable for preservation as wilderness only that portion of the WSA with the highest wilderness values. The area is quite large, extremely natural, contains both good topographic and vegetative screening and is highly scenic. It is well watered and contains a good diversity of plant and animal species. Primitive recreational opportunities are numerous and outstanding. Mineral values in the acreage recommended suitable will be assessed by the U.S. Geological Survey and the Bureau of Mines before a final recommendation is sent from the Secretary of Interior to the President.

It is recognized that military overflights impact solitude opportunities in the Lahontan Resource Area WSAs (Lahontan Wilderness Technical Report, pp. 2-5). Proposed increases in the number and type of overflights would result in additional impacts to wilderness values, although the extent of such impacts is currently unknown. At this time the wilderness characteristics are of such high quality that our analysis indicates that the wilderness values outweigh the impact of overflights.

SECTION TWO

COMMENTS AND RESPONSES TO THE DRAFT SUPPLEMENT RMP/EIS

Comment Letters

Letter No.	Commentor
1	Churchill County
2	Bill Bains
3	Harry Melts
4	The Wildlife Society
5	National Park Service
6	Richard Bargen
7	John R. Swanson
8	Ethel W. Thornily
9	U.S. Bureau of Reclamation
10	Churchill County Museum and Archive
11	Reno Area Interested Divers
12	Terrence J. Melby
13	California Association of 4WD Clubs
14	Nevada Department of Wildlife
15	U.S. Environmental Protection Agency
16	Sierra Pacific Power Company
17	R.T. Forest

Comment Letter 1

Churchill County Administration Office

190 WEST FIRST STREET FALLON, NEVADA 89406 (702) 423-5136

August 29, 1984

Mr. Thomas J. Owen, District Manager
U. S. Department of the Interior
Bureau of Land Management
1050 E. William St., Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

The Board of Churchill County Commissioners has completed its review of the Draft Supplement to the Lahontan Draft Resources Management Plan/Environmental Impact Statement, (RMP/EIS). As you may remember in our comments dated December 21, 1983, addressed to Edward Spang, State Director, we were extremely pleased with the rational approach taken by the B.L.M. in presenting the preferred alternates.

The Draft Supplement does not markedly depart from the original RMP/EIS in terms of management actions other than the inclusion of utility right-of-way corridors and consideration of Soda Lake as an area of critical environmental concern.

We continue to maintain that your suggestion to remove the Stillwater Range and Job Peak from the Wilderness Study area is logical from both an esthetic and economic point of view due to ongoing mining, cattle grazing and now more recently, the development of geothermal energy production. Portions of Churchill County are uniquely suited to the production of geothermal energy and because of this potential, should not be locked up in wilderness designations. Consideration should be given not only to the production of geothermal energy, but the export of surplus energy generated to areas with high energy demands. The positive economic impact of energy development and exportation should not be denied the residents of Churchill County and the State of Nevada.

Comment Letter 1

Mr. Owen
August 29, 1984
Page 2

As the geothermal industry grows, the potential for new jobs and an increase of our tax base will enhance our community as well as the entire State. We would be inclined to favor the Commodities Production alternative contained in the RMP/EIS Supplement since it proposes the designation of the greatest amount of right-of-way corridors.

Realizing that we are in a temporary downward trend with respect to energy costs due to a surplus created by conservation measures, we forsee a time in the near future where the need for all forms of energy production will be necessary. This need would best be served by the reservation of right-of-way corridors now thereby saving the energy consumer the additional costs associated with development of new corridors at a later time which through foresight would be available when required.

1-1 The issue of whether or not to support the nomination of Soda Lake for the National Register of Historic Places, or the designation of Soda Lake as an area of critical environmental concern, is a difficult value judgement. It might be noted that a number of years ago the Board of County Commissioners, upon the advice of the Churchill County Recreation Committee, had prepared a series of plans establishing a park in the area south of, and adjacent to, Big Soda Lake. Although the proposal had certain merits, the lack of resources to develop the property in an appropriate manner resulted in the abandonment of the project.

Therefore, the Board of Churchill County Commissioners wish to go on record supporting the Commodities Production Alternative as contained in the Draft Supplement, Lahontan RMP/EIS.

The Preferred Alternative, although not allowing for as much right-of-way corridor as may be ultimately necessary to realize the energy growth potential available in our County, would be reluctantly supported in the event of a conflict between the Commodities Production and the Preferred Management alternatives.

Sincerely,

BJORN P. SELINDER
County Manager

BPS:ba

Response Letter 1

1-1 The Carson City District would be supportive of a Cooperative Management Agreement with Churchill County on the management of Soda Lake.

Comment Letter 2

truckee meadows community college

August 7, 1984

Edward F. Spang
United States Department of the Interior
Bureau of Land Management
Nevada State Office
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

re: 1617
(NV-030)

Dear Mr. Spang:

As one of the longest-lived active Diving instructors in Nevada, I support the preservation of Soda Lake as a diving park. The lake, with its unusual combination of depth, fresh water, silt and underwater structures makes an excellent site for advanced diver training, as well as an interesting dive for the recreational diver. I feel its being set aside as an underwater park will benefit both the diving community and the Fallon area.

Should you have any questions, please feel free to call.

Sincerely,

Bill Baines

BB/cb

[illegible] Boulevard [illegible] Nevada 89512, (702) 673 7000
[illegible] of the [illegible] of Nevada System

Comment Letter 3

District Manager
Carson City District
1050 E Williams St.
Carson City, NV 89701

08.08.84.

Comments on Lahontan RMP/EIS:

Support: MID-RANGE Alternative.

Rationale: This Alternative will increase access for motorized recreation. Too much land is being locked up for single use as wilderness to benefit but a few environmental extremist. Environmental protection is desirable but to carry it too extreme as anything in excess is undesirable.
BL M should take into consideration if all users wishes are represented. The environmental extremist write in far greater numbers than the motorized recreationist due to the extremist having more academic background and are to a certain degree professional letter writers.

Support Soda Lake for National Register of Historical Places but also urge obtaining right-of-ways and easements for recreational access. No further protection needed since scenery around Soda Lake is of a common type and is seen in vast areas in Nevada.

Sincerely,

Harry Melis

Harry Melis
General Delivery
Porthill, Idaho, 83853

Comment Letter 4

The Wildlife Society

Nevada Chapter

BUR OF LAND MANAGEMENT
CARSON CITY DIST OFFICE
AUG 20 11 16 AM '84

August 16, 1984

District Manager
Carson City District
1050 E. William St.
Ste. 335
Carson City, NV 89701

Dear Sir:

The Nevada Chapter of the Wildlife Society has reviewed the supplement to the Draft EIS/RMP for the Lahanton Resource Area. We have no comments or suggestions to forward to you at this time. However, we would appreciate being appraised of subsequent planning efforts on the Carson City District.

Sincerely,

Donald A. Klebanow

Dr. Donald A. Klebanow
President, Nevada Chapter
of the Wildlife Society

DAK/klb

The International Organization of Professional Wildlife Ecologists and Managers

Comment Letter 5

United States Department of the Interior

BUR OF LAND MANAGEMENT
CARSON CITY DISTRICT OFFICE

NATIONAL PARK SERVICE
WESTERN REGION
450 GOLDEN GATE AVENUE, BOX 36063
SAN FRANCISCO, CALIFORNIA 94102

AUG 21 1984

IN REPLY REFER TO:

L7619 (WR-RPE)

August 15, 1984

Memorandum

To: District Manager, Bureau of Land Management, Carson City

From: ACTING Regional Director, Western Region

Subject: Supplement to the Draft Lahontan Resource Management Plan and ACTING Environmental Impact Statement (DES-84/35)

In accordance with the Nevada State Director's letter of June 22, 1984, we have reviewed the subject Supplement. Our original comments on the Draft Plan and EIS were submitted to you by our memorandum of December 8, 1983. We have the following comments on the Supplement.

5-1 Our original review comments and concerns with the basic document remain unaddressed in the Supplement. In addition, pages 4-2, 4-5, and 4-9 contain the statement (for the respective alternatives under discussion) "Cultural resources survey and mitigation measures as stipulated in Standard Operating Procedures Numbers 14 and 15 will be followed." What is the content and location of these documents and what do the procedures consist of? Also, on pages 4-15, the Supplement states that survey and mitigation will be carried out as stated in Standard Operating Procedures 6 and 14. Is Number 6 a typographical error and, if not, what does that procedure consist of as opposed to Numbers 14 and 15?

We appreciate the opportunity to review and comment on the Supplement. Should you have any questions on these comments, our technical contact is Holly Dunbar, Staff Archeologist, Interagency Archeological Services, who may be contacted at (415) 556-5772 (FTS: 556-5772) or at the letterhead address.

W. Russell Wirth

cc:
WASO (762)
National Register Programs-IAS

Response Letter 5

5-1 Please refer to Chapter 2 of the Supplement for a description of Standard Operating Procedures.

Comment Letter 6

Dear Mr. Spang;

6-1 The comments I have to make are few, thankfully for both of us.

1. The comments submitted for the first draft, by the public, should have been included in the DEIS.

6-2 2. The most pertinent comments regarding the actions of the Navy in the proposed Supersonic Operations Area and in the Integrated Air Warfare Training Complex that they are attempting to implement over central Nevada, cannot be ignored or answered by commenting that the Navy will address these questions. The Navy states that it will commence a major expansion of air warfare training exercises in this region. These effects cannot be ignored.

6-3 3. The granting of radar sites to the Navy by the BLM, sites which are located in Wilderness Study Areas, is not proper.

These locations were permitted on the basis of FONSI's based on PEA's produced by the Navy. I have read the PEA's and they contain technically incorrect information and in several important respects are simply untruthful. To base a FONSI on such a document is demeaning to the BLM and the DOI.

4. A proper document, evaluating the Lahontan Resource Area, must include the one major factor which has not been dealt with, that is the Fallon NAS operations, present and proposed. The present DEIS and supplement must be fully revised on this basis. The FONSI's noted above should be revoked. It saves time in court.

Sincerely,
Richard Bargen
Richard Bargen.

Response Letter 6

6-1 The commentor is apparently referring to the Draft Supplement rather than the DEIS. The Supplement was prepared in response to public comment on the Draft. Council of Environmental Quality regulations require that public comments be included in Final EISs, not Draft Supplements. Therefore, they have been included in Section of Chapter Four in this document.

6-2 Please refer to page 1-2 of the DEIS which recognizes that the potential future Navy proposals are likely to have substantial impacts on the RMP area. However it would not be appropriate to include an analysis of the impacts of their proposals in this document not only because proposals are not part of the proposal RMP but also because a description of their proposed action is not available. As page 1-2 states, the impacts of the Navy proposals will be analyzed in a seperate EIS.

6-3 The document in question for this public review analyzes right-of-way corridors and ACECs, it has nothing to do with radar sights. Therefore no response is warranted. However, for the commentors information, during the BLM's review of the Navy's Preliminary Environmental Assessment (PEA's) several deficiencies were found. The Navy subsequently corrected those deficiencies for the final Environmental Assessments on which the Finding of No Significant Impact (FONSI) was based. Furthermore, the BLM conducted its own on-site inspections and clearances prior to granting the radar sites.

Comment Letter 7

[illegible]

August 22, 1984

Bureau of Land Management
District Manager - Carson City District
1050 E. Wilson St. - Suite 335
Carson City, Nevada 89701

Dear Sir,

Please accept my good wishes - as follows, concerning

Draft Wilderness Management Plan and Environmental Impact Statement.

I am impressed with the area, its needs, and regard such Interior Resource Areas as outstanding outstanding wilderness, scenic, wildlife, historic, and cultural resources

I believe National Wilderness

an area that provides a vital and so all Americans hope, a lasting refuge for Man, and for all life, on this endangered planet.

I fully hope that this Interior Resource area be managed as a permanent Preserve and that all Public Lands will be managed permanently as Preserves.

a permanent Preserve to protect ecosystems, preserve watersheds, soil and enhance wildlife - that will - then be spectacular habitats, protect and preserve hydrological diversity, Nature - native stock - damaged areas to return natural environmental conditions and to preserve - protect, strengthen and expand Wilderness.

I believe that Wilderness is the foundation of all Land - Water Resources

with Wilderness preservation - protection, strengthening and expansion the governing goal of all Land - Water Resources planning and management

as the planning and permanent management alternative for this Interior Resource Area, I hope that other natural - Parks & Wilderness - Wildlife - Outdoor Resources be dropped at this time.

I strongly hope that the following areas - acres of Bureau of Land Management lands - waters located on this Interior Resource area be added to our National Wilderness Preservation System, as they further enhance Wilderness attributes.

- Pequop Mountains 132,000 (Full)
- Shell Creek Range 106,000
- Elko Alpine Mountains 249,000
- Bob Pass 107,000
- Desatoya Mountains 59,000
- these additional areas - acres located on such Bureau of Land Management lands - waters on this Interior Resource area, to the same 248,000.

To achieve a grand total of some (at least) 899,000 acres of Bureau of Land Management lands - waters, Interior Resource area, to be added to our National Wilderness Preservation System - at this time.

I support the classification of Fort Sale - and Emigrant Mountain as of cultural significance - natural concern. The Fort Sale - and area - is a National Monument potential as the Interior National Monument - National Park Service - is over 2,850 acres.

I oppose any and all Repeal - or Bay - Conners Mining Damage - Mining Land - water resources.

I support Bennett's forms of multiple and surface land management as well current, prospective potential Wilderness - including - Wilderness Study areas.

With No. Pollution - Jerry Brown's areas.

I oppose all Sale holdings on all Public Lands. With No. Sites and Jerry Public lands.

I believe we have our National Lands and waters, including Wilderness, are have America!

Sincerely, John [illegible]

Comment Letter 8

August 21, 1984

District Manager
Carson City District
1050 E Wilson St. Ste. 335
Carson City, NV 89701

Dear Sir:

There seemed to be only small differences between the various alternatives but at least the Resource Protection Alternative appeared to have the right purpose when it is called the "Resource Protection Alternative". It is so very easy to damage the environment, wildlife, and other resources and so difficult and costly to repair the damage that protection would seem to be the only sensible course of action. With the present administration in Washington it is becoming increasingly difficult to do this despite the favorable environmental statemens made there in an attempt to influence the coming election.

Yours truly,

Ethel W. Thornley and many friends

Mrs. Ethel W. Thornley
18643 Schoenherr
Detroit, MI 48205

United States Department of the Interior
~~WATER AND POWER RESOURCES SERVICE~~
BUREAU OF RECLAMATION
MID-PACIFIC REGIONAL OFFICE
2800 COTTAGE WAY
SACRAMENTO, CALIFORNIA 95825

IN REPLY REFER TO: MP-150

AUG 24 1984

Mr. Tom Owen, District Manager
Carson City District
Bureau of Land Management
1050 E. William St., Ste. 335
Carson City, Nevada 89701

Dear Mr. Owen:

We have reviewed the Draft Supplement, Lahontan Resource Management Plan and Environmental Impact Statement and have no comments.

Sincerely,

Brenda J. Washington
Acting Regional Director

Comment Letter 10

CHURCHILL COUNTY MUSEUM AND ARCHIVE
CHURCHILL COUNTY MUSEUM ASSOCIATION, INC.
1050 South Maine Street
Fallon, Nevada 89406

August 27, 1984

Thomas J. Owen
District Manager
Carson City District, BLM
1050 E. William St., #335
Carson City, NV 89701

Dear Tom,

10-1 I am writing this as a public comment for the DRAFT SUPPLEMENT on Soda Lake. After reviewing the document I am totally in favor of 5. Preferred Alternative. I have enclosed a copy of the research paper I compiled on both lakes, and I think that it should be included in the public record.

The Bureau of Land Management stands in a unique position to provide a true "first" in recreation and management with the thoughtful development of Soda Lake. The positive aspects of such a development to both the community and the Bureau are similar to the Hidden Cave Project. It will be a highly visible area due to its uniqueness. An underwater diver's park in the desert will attract interest and study from throughout the United States.

After researching and studying both lakes for many years I feel that we will have great support for the development, particularly from diving groups and natural and physical scientists. I know that divers from many areas use the site, but if it was interpreted and protected, it would be more valuable to them and to the community. I am sure that we could develop supplemental funding from these sources.

Please keep me posted on the progress of the project. I am always pleased to read about Harold Duarte and the Council. He is doing a splendid job. I wish I was still working with you.

Sincerely,

Sharon Lee Taylor
Director/Curator
Churchill County Museum & Archive

:enclosure

(702) 423-3677

Response Letter 10

10-1 The subject research paper is an excellent analysis of the history of Soda Lake. Unfortunately it could not be reproduced in this document due to excessive printing costs. However, it has been included in official BLM files and is available for public inspection at the Carson City District Office.

Comment Letter 11

P. O. Box 10141
Reno, NV 89510

August 27, 1984

United States Department of the Interior
Bureau of Land Management
Nevada State Office
300 Booth Street
P. O. Box 12000
Reno, NV 89520

Attention: Mr. Edward F. Spang

Re: Lahontan Resource Management Plan and Envirunmental Impact Statement

Dear Mr. Spang:

On behalf of the Reno Area Interested Divers (R.A.I.D.), I would like to extend the support of this scuba diving club to your efforts in the protection of Big Soda Lake.

As a scuba diver who has many times enjoyed the one-of-a-kind experience of diving over the old Soda Works, I would hate to see this unique piece of history lost someday to future divers. I would like to see this area set aside as a park for all to enjoy and urge enactment of Alternate #5 as stated in the Lahontan Resource Management Plan and Environmental Impact Statement as prepared by the U. S. Department of the Interior, Bureau of Land Management, Carson City District, Carson City, Nevada.

Sincerely,

RENO AREA INTERESTED DIVERS

Ginny Ganthner
President

Comment Letter 12

P. O. Box 10141
Reno, NV 89510

August 27, 1984

United States Department of the Interior
Bureau of Land Management
Nevada State Office
300 Booth Street
P. O. Box 12000
Reno, NV 89520

Attention: Mr. Edward F. Spang

Re: Lahontan Resource Management Plan and Environmental Impact Statement

Dear Mr. Spang:

I am a P.A.D.I. Open-Water Scuba Instructor, past president of the Reno Area Interested Divers, and an avid scuba diver who has worked for over two (2) years marking and mapping the items which lie beneath Big Soda Lake's surface.

This lake holds a wealth of history and unique items for scuba divers to explore and provides one of the more fascinating diving opportunities in this area.

I am glad to see efforts made for a land management program to protect this area for the benefit of the public and public enjoyment.

I personally support the enactment of Alternate #5 as stated in Lahontan Resource Management Plan and Environmental Impact Statement as prepared by the U. S. Department of the Interior, Bureau of Land Management, Carson City District, Carson City, Nevada.

Sincerely,

Terrence J. Melby

Comment Letter 13

CALIFORNIA ASSOCIATION OF 4WD CLUBS INC.

5831 Rosebud Lane, Unit M-1
Sacramento, CA 95841
(916) 338-4540

August 29, 1984

District Manager
Carson City District
1050 E. William St, Suite 335
Carson City, NV 89701

Dear Sir,

The draft Lahontan Resource Management Plan and Environmental Impact Statement have been reviewed as requested. The preferred alternative is the best choice of management options for the Pyramid-Carson areas. We have no further comments at this time as it will not affect our activities in the areas involved.

Sincerely,

Ed Dunkley
Field Representative

ED:11

Comment Letter 14

STATE OF NEVADA
DEPARTMENT OF WILDLIFE
1100 Valley Road
P.O. Box 10678
Reno, Nevada 89520-0022
(702) 789-0500

RICHARD H. BRYAN
Governor

WILLIAM A. MOLINI
Director

August 29, 1984

Mr. Thomas J. Owen
District Manager
Carson City District
Bureau of Land Management
1050 E. William Street, Suite 335
Carson City, NV 89701

RE: SAI NV #85300011
LAHONTAN DRAFT SUPPLEMENT

Dear Tom:

14-1 We appreciate the opportunity to review and provide comment on the Supplement to the Draft Resource Management Plan and Environmental Impact Statement for the Lahontan Resource Area which addresses right-of-way corridors and the potential for areas of critical environmental concern. As mentioned previously to members of your staff, our major concern relates to that portion of the powerline corridor alternative which is adjacent to the Stillwater National Wildlife Refuge. Rather than endorsing an alternative which has the potential to adversely affect wildlife populations associated with the refuge in addition to transversing the Stillwater mountain range in two separate locations, we believe that the best and certainly the most economical alternative would be to follow the existing corridor through Dixie Valley.

Your consideration in addressing the above listed concern would be greatly appreciated.

Sincerely,

William A. Molini
Director

RPM:pw

cc: State Clearinghouse
Region I

Response Letter 14

14-1 In response to this comment, corridor segment D-W has been moved east of the Stillwater Wildlife Refuge as shown on the Preferred Alternative Corridor Map.

Rights-of-way through the corridor will only be granted if and when the Job Peak WSA is dropped from further consideration as wilderness.

Comment Letter 15

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca 94105

AUG 1984

Thomas J. Owen, District Manager
Bureau of Land Management
1050 East William Street, Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

The Environmental Protection Agency (EPA) has reviewed the Draft Supplement (DS) for the LAHONTAN RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, U.S. DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT, CARSON CITY DISTRICT, CARSON CITY, NEVADA. We have the enclosed comments to offer at this time regarding the DS.

We have classified this DS as Category LO-2 (lack of objections - more information needed). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DS. Please send four copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is offically filed with our Washington, D.C. office. If you have any questions, please contact Patrick J. Cotter, Federal Activities Branch, at (415) 974-0948 or FTS 454-0948.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure (1 page)

Comment Letter 15

-1-

General Comments

15-1 The DS adequately addresses the issues raised concerning Soda Lake and a majority of the Right-of-Way Corridors through the Lahontan Resource Management Plan area. However, the location of Planning Corridor P-Q-D-S-G, for the Preferred Alternative, appears to run through the extreme southeastern edge of the Stillwater National Wildlife Refuge. Please consider relocating the segment between points D and S closer to Township 20 North, Range 33 East. This would move the utility corridor east of the Refuge.

Response Letter 15

15-1 Please refer to response 14-1.

Comment Letter 16

Sierra Pacific Power Company

JACK L. BYROM, P.E.
Vice President-Engineering

August 29, 1984

Return Receipt Requested

Mr. Thomas J. Owen, Manager
Carson City District
Bureau of Land Management
1050 East William Street, Suite 335
Carson City, Nevada 89701

Re: BLM Draft Supplement to the Draft Resource Management Plan and Environmental Impact Statement for the Lahontan Resource Area

Dear Mr. Owen:

Thank you for the opportunity to comment on the Draft Supplement - Lahontan RMP and EIS. The identification of the corridor issue and the subsequent designation of corridors in the Draft Supplement are in keeping with the intent of the Federal Land Policy and Management Act of 1976 (FLPMA).

Sierra Pacific Power Company cannot support the Draft Supplement or its "Preferred Alternative" unless clarification and resolution of areas of major concern as outlined in this letter are made.

The following are areas of major concern that Sierra Pacific feels need to be clarified and/or resolved:

1. a) Draft Supplement Quote:

Chapter 2 - Alternatives - Preferred Alternatives - Right-of-Way Corridors - Management Actions - page 2-9

1) "Designate 187 miles of rights-of-way corrodors which include existing transmission lines and identify 174 miles of planning corridors, as shown on the Preferred Corridor Alternative Map. Existing rights-of-way corridors extend one mile on both sides of the existing right-of-way. Planning corridors are two miles in width. No private land is included."

16-1 b) Problem: Sierra Pacific finds the two-mile corridor width for both existing and planning corridors unacceptable. The two-mile corridor width is inconsistent with the directions given in other BLM Nevada resource management plans. The corridor issue is one of regional and national concern and effort. The "...identification of realistic planning corridor opportunities requires close coordination..." (BLM,NSO Instruction Memorandum No. NV 84-121, January 25, 1984). Resource area consistency is the key to the flexibility and usability of designated and future or planning corridors.

P.O. BOX 10100/RENO, NEVADA 89520/TELEPHONE 702/789-4832

Response Letter 16

16-1 The full quote from NSO Instruction Memo 84-121 is: "The significance of the national need for corridors and identification of realistic planning corridor opportunities requires close coordination between the utility industry and BLM" (emphasis added). Neither this statement nor any other statements in Memo 84-121 imply that all corridors be the same width. Furthermore, no other memos, manuals or regulations require any specific corridor width. The BLM Corridor Manual (2801) emphasizes flexibility in determining corridor width and states that not only are industry needs to be taken under consideration, but all other factors influencing public land use as well.

Corridors identified in this document are consistent in that they directly connect with corridors identified in adjoining RMPs. The two mile width proposed for the Lahontan RMP was based on providing ample flexibility to meet utility industry needs while providing for other resource uses and minimizing adverse environmental impacts. Furthermore, as outlined in Chapter 2 of this document, future rights-of-way will be considered outside of corridors on a case-by-case basis. This includes the area within the three to five mile width proposed by Sierra Pacific.

Comment Letter 16

Mr. Thomas J. Owen
August 29, 1984
Page 2

c) Solution: Sierra Pacific recommends the following language:

1) "...Existing rights-of-way corridors extend one and one-half mile on both sides of the right-of-way. Planning corridors are five miles wide. No private lands are included."

2. a) Draft Supplement Quote:

Chapter 2 - Alternatives - Preferred Alternatives - Right-of-Way Corridors - Management Actions - page 2-9

1) "Designate 187 miles of rights-of-way corrodors which include existing transmission lines and identify 174 miles of planning corridors, as shown on the Preferred Corridor Alternative Map. Existing rights-of-way corridors extend one mile on both sides of the existing right-of-way. Planning corridors are two miles in width. No private land is included."

16-2 b) Problem: Sierra Pacific finds that one important corridor has been left out of the Preferred Alternative and another has been mislabled. Corridor Z-J provides for energy for Carson Valley with a high potential for additional facilities. This corridor directly ties to an energy source - Fort Churchill Power Station and an interconnect and transfer of additional energy resources (i.e., geothermal).

16-3 Corridor D-F is a planning corridor and should be a dashed line.

c) Solution: Sierra Pacific recommends the following changes and additions:

- See attached BLM Preferred Alternative Corridor Map for comments.

- Add the following corridor:

1) "m. Z-J, a corridor used in the transmission of power from the Fort Churchill Power Plant to Carson City."

3. a) Draft Supplement Quote:

Chapter 2 - Alternatives - Right-of-Way Corridors - Objectives - pages 2-3, 2-5, 2-7, and 2-9

"To concentrate adverse impacts to the environment by locating compatible rights-of-way in designated corridors..."

b) Problem: Sierra Pacific believes that rights-of-way are a multiple use of public lands just like wildlife, recreation, wilderness, etc. A concentration of wildlife would cause adverse impacts to the environment. The above statement predicious rights-of-way over all other multiple uses.

Response Letter 16

16-2 Corridor Z-J was not included in the draft preferred alternative since the powerline in it is for local use, however it has been included in the final preferred alternative in this document as requested.

16-3 Since corridor D-F contains an existing transportation right-of-way it is a right-of-way corridor, not a planning corridor, and is displayed correctly on the map.

Comment Letter 16

Mr. Thomas J. Owen
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Page 3

c) Sierra Pacific recommends this statement be deleted in the FEIS.

4. a) Draft Supplement Quote:

Chapter 2 - Alternatives - Preferred Alternatives - Right-of-Way Corridors - Management Actions - page 2-9

1) "I-F-R-E, a corridor running from the Fort Chruchill Power Plant to Utah. It contains a major powerline, supplying much of the electricity for northern Nevada. This right-of-way provides the northern boundary of the Desatoya Mountains WSA. The corridor does not include any portion of the WSA."

16-4 b) Problem: Sierra Pacific finds a cunflict between wilderness and corridors. The Desatoya WSA NV-030-110 Preferred Alternative eliminates or severly hampers the effective use of a major east-west corridor. Sierra Pacific requests a boundary adjustment to accommodate a realistic corridor.

c) Solution: Modify the Preferred Wilderness Alternative boundary on the Desatoya's NV-030-110 to be one and one-half miles southeast from the existing 230 kV transmission line.

5. a) Draft Supplement Quote:

Chapter 2 - Implementation - Right-of-Way Corridors - pages 2-12 and 2-13

1) Entire section entitled "Standard Operating Procedures."

16-5 b) Problem: Sierra Pacific finds this section does not apply to corridors. Corridors are planning tools and not land withdrawals, rights-of-way, or reservations. The Standard Operating Procedures outlined in this section appear in right-of-way grants. This was adequately stated on page 2-11 in the third paragraph.

c) Solution: Sierra Pacific recommends that the Standard Operating Procedures be eliminated.

6. a) Draft Supplement Quote:

Chapter 3 - Affected Environment - Powerlines - page 3-2

1) "...They vary from 80 to 200 feet tall..."

16-6 b) Problem: Sierra Pacific does not have a structure over 120 feet in our entire system and no structure over 100 feet in the Lahonton Resource Area.

c) Solution: Sierra Pacific recommends the following change:

1) "...They vary from 70 to 120 feet tall..."

Response Letter 16

16-4 No boundary adjustments would be appropriate since the Desatoya Mountains have the region's highest quality wilderness characteristics and ample space (2 miles) is provided north of the proposed boundary in corridor I-F-R-E for additional rights-of-way.

16-5 Standard operating procedures were included because they were used in preparing the impact analysis outlined in Chapter Four.

16-6 The corridors proposed in this document are not reserved for the exclusive use of Sierra Pacific. They are also available for other power firms as well as other uses. The 200 foot figure was used because the Los Angeles Water and Power Department's line in corridor A-B-I has towers nearly 200 feet high.

Comment Letter 16

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7. a) Draft Supplement Quote:

Chapter 4 - Environmental Consequences - Assumptions for Analysis - page 4-1

1) "2. For all other alternatives it was assumed that rights-of-way would be granted only in corridors."

16-7 b) Problem: Sierra Pacific questions the validity of this assumption. We perceive that BLM's projected impacts are all rights-of-way side by side for one mile wide to five miles wide depending on which alternative you look at. This is an unrealistic approach to corridor analysis. Corridors were introduced into the land planning system so as not to be precluded when addressing multiple land uses. Corridors are a planning tool and therefore have no specific impacts until utilized. The only environmental consequence assumption that should be made is that the demand for utility and transportation rights-of-way will increase. Most major conflicts, i.e., wilderness, ACEC's, etc., have been avoided in the industry's corridor review (Western Regional Corridor Study).

16-8 Therefore, rights-of-way are addressed on a case-by-case basis within or out of designated or planned corridors. Then the environmental consequences are determined and/or mitigated in that process. Also, assumption number 2 is a false assumption. Sierra Pacific intends to apply for rights-of-way outside of the designated corridors.

c) Solution: Sierra Pacific recommends that the entire Chapter 4 be redrafted in light of a biased analysis.

The following is a consolidation of comments from the Environmental Consequences Section. Only the major errors or false statements were addressed in order to keep these comments brief and to the point. In general, this entire section is lacking in sound analysis and needs to be rewritten.

8. a) Draft Supplement Quote:

Chapter 4 - Environmental Consequences - All Alternatives - Wildlife - pages 4-2, 4-5, 4-8, 4-11, and 4-14

Wildlife

"Impacts to wildlife would be minimal given the Standard Operating Procedures outlined on pages 2-16 to 2-18 in the Draft RMP and 2-17 and 2-18 of this document."

"Construction of right-of-way maintenance roads could open up more areas for hunting. This could reduce wildlife populations in those areas along 426 miles of corridors under this alternative."

Response Letter 16

16-7 The Bureau requires analysis of corridors and subsequent rights-of-way prior to corridor designation (Manual 2801.1D). Given that specific right-of-way applications have not been received, the analytical assumptions outlined in Chapter Four are appropriate.

16-8 Please refer to the implementation section of Chapter Two which states that the designation of corridors does not preclude the granting of rights-of-way outside of corridors. It is expected that minor local lines will be located outside of corridors. The corridor planning process is based on industry's needs for major interstate rights-of-way which are expected to be located in corridors, therefore assumption No. 2 is appropriate.

Comment Letter 16

Mr. Thomas J. Owen
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16-9 b) Problem: See item 5 for comments on Standard Operating Procedures. Sierra Pacific has very few maintenance roads on federal lands within our service territory. Normally, we acquire construction access roads, not maintenance roads. Maintenance roads are generally understood to be those roads which have been bladed or built to some design or construction standard and are periodically maintained. Access roads are generally overland access and require no road building or maintenance. Aside from this fact, the Nevada Department of Wildlife regulates any hunting pressure by adjusting seasons, setting limits, or restricting areas. Access roads could have a beneficial impact on the manageability of hunting areas which is another multiple use of the public land.

c) Solution: Sierra Pacific recommends the following language changes in all Alternatives:

"Impacts to wildlife would be minimal given the Standard Operating Procedures outlined on pages 2-16 to 2-18 in the Draft RMP."

Sierra Pacific recommends the following to be deleted:

Remove the entire second paragraph under Wildlife in all the Alternatives.

9. a) Draft Supplement Quote:

Chapter 4 - Environmental Consequences - All Alternatives - Vegetation - pages 4-2, 4-5, 4-8, 4-11, and 4-14

Vegetation

"A minimal amount of vegetation could be destroyed along potential future transmission line maintenance roads and at tower bases. Undesirable plants such as halogeton could become established in disturbed areas..."

16-10 b) Problem: Sierra Pacific finds that this statement is not entirely true. We generally do not blade or otherwise remove vegetation for access roads since the majority of our projects utilize overland travel for construction. Besides, if activity on roads keeps off native vegetation, it will also keep off undesirable vegetation.

c) Solution: Sierra Pacific recommends the following language change:

"A minimal amount of vegetation could be destroyed along potential future transmission line access roads and at tower bases."

Response Letter 16

16-9 The second paragraph under wildlife has been changed as follows "Construction and/or establishment of maintenance or access roads could open up more areas for hunting". Refer to Revisions, Additions, and Errata section.

16-10 As stated previously, corridors are not reserved for the exclusive use of Sierra Pacific. Other firms have their own policies on construction of access roads. Also, many of the more undesireable plant species including halogeton can become established and even thrive along roads with a limited amount of traffic.

Mr. Thomas J. Owen
August 29, 1984
Page 6

10. a) Draft Supplement Quote:

Chapter 4 - Environmental Consequences - All Alternatives - Visual Resources - pages 4-5, 4-8, 4-11, and 4-14

Visual Resources

All comments under the above heading in all Alternatives.

16-11 b) Problem: Sierra Pacific finds that again a false assumption has been made which greatly distorts or biases the environmental consequences. First, a corridor is a planning tool and, therefore, has no visual impact until utilized. Second, to assume facilities will fill up the entire corridor, i.e., a right-of-way grant from one mile wide up to

16-12 five miles wide, depending on which Alternative you look at, is unrealistic. The widest right-of-way held by Sierra Pacific is 140 feet. Under your assumption, at our widest right-of-way width, you would place 38 facilities per one mile width of corridor and 190 separate facilities in a five mile wide corridor. Then only by this assumption would the acreage quotes or percent of RMP area impacted be correct. This obvious distortion in a public document is very disappointing to Sierra Pacific. Wilderness designation or ACEC's are the taking or withdrawing of the public lands from multiple use. Corridors are a planning tool which are not a taking or withdrawing of the public lands from multiple use.

c) Solution: Sierra Pacific recommends that this entire section be rewritten.

11. a) Draft Supplement Quote:

Chapter 4 - Environmental Consequences - All Alternatives - Wilderness - pages 4-3, 4-6, 4-9, 4-12, and 4-15

Wilderness

All comments under the above heading in All Alternatives.

b) Problem: Sierra Pacific has in item 4 addressed the wilderness/corridor conflict. The questions we have here are first, how can an inanimate object like a power line affect the solitude opportunity outside a wilderness? and second, are the creation of administrative "wilderness buffer zones" the intent of Congress?

16-13 First, inanimate objects do not affect wilderness solitude in light of the definition found on page 7 in the U.S. Department of the Interior, BLM, Wilderness Management Policy, September 1981 and herein quoted:

16-11 Please refer to response 16-7.

16-12 Nowhere in the Draft was it stated or assumed that the corridors would be entirely filled with utility facilities. Not only would this be technically infeasible, but the demand is quite limited. Powerlines could be located anywhere within the corridor, therefore the entire area within the corridor could potentially be affected by a future powerline. Furthermore, the visual impacts of powerlines are not limited to the 140 foot right-of-way. Powerlines would likely be visible from most if not all areas within the corridors and many areas outside the corridors.

16-13 The Bureau's Wilderness Study Policy (1982) states that the "...sights and sounds of human activities and works outside the boundaries of the wilderness study area may be taken into account in assessing the quality of an area's naturalness or it's opportunity for solitude or primitive recreation" (emphasis added). As outlined in the supplement, a minor impact to wilderness quality could occur if additional powerlines are constructed near the WSAs. The sight of such a powerline could affect the sense of solitude of a visitor in a WSA through the visual intrusion of work or man into an otherwise natural setting.

16-13 "...Solitude is defined as (1) the state of being alone or remote from habitations; isolation; (2) a lonely, unfrequented or secluded place. The emphasis is on the opportunities a person has to avoid the sights, sounds, and evidence of other people within a particular area..."

Also, no corridor, with exception mentioned in item 4, traverses a Wilderness Study Area recommended for wilderness designation in the Draft Lahonton RMP Preferred Alternative. Therefore, there are no negative impacts to recommended wilderness and absolutely no negative impacts to non-recommended wilderness which is contrary to the statement found in the summary under Environmental Consequences.

16-14 Second, Sierra Pacific strongly opposes any statement that administratively constitutes a "wilderness buffer zone" around Wilderness Study Area recommended or not for wilderness designation. Sierra Pacific feels that Congress did not intend to create wilderness buffer zones. If a WSA cannot stand on its own merit as outlined in the Wilderness Act of September 3, 1964, then the WSA unit should be recommended as unsuitable for inclusion in the National Wilderness Preservation System. When the Wilderness Act talks of solitude or primitive and unconfined type of recreation, it was looking to preserve those opportunities within a given area or boundary. There is nothing to our knowledge in the Wilderness Act that states or implies that man's imprint will not be seen from a wilderness area.

c) Solution: Sierra Pacific recommends that the BLM rewrite the environmental consequences from the corridor issue. Adverse impact on wilderness characteristics is improperly applied to the corridor.

In conclusion, Sierra Pacific finds the Draft Supplement for the Draft Lahontan Resource Management Plan and EIS to be a non-objective and biased government document in light of the false assumptions and contradictions presented. Sierra Pacific strongly recommends that the necessary changes be included in the Final Lahontan Resource Management Plan and Environmental Impact Statement.

Sincerely,

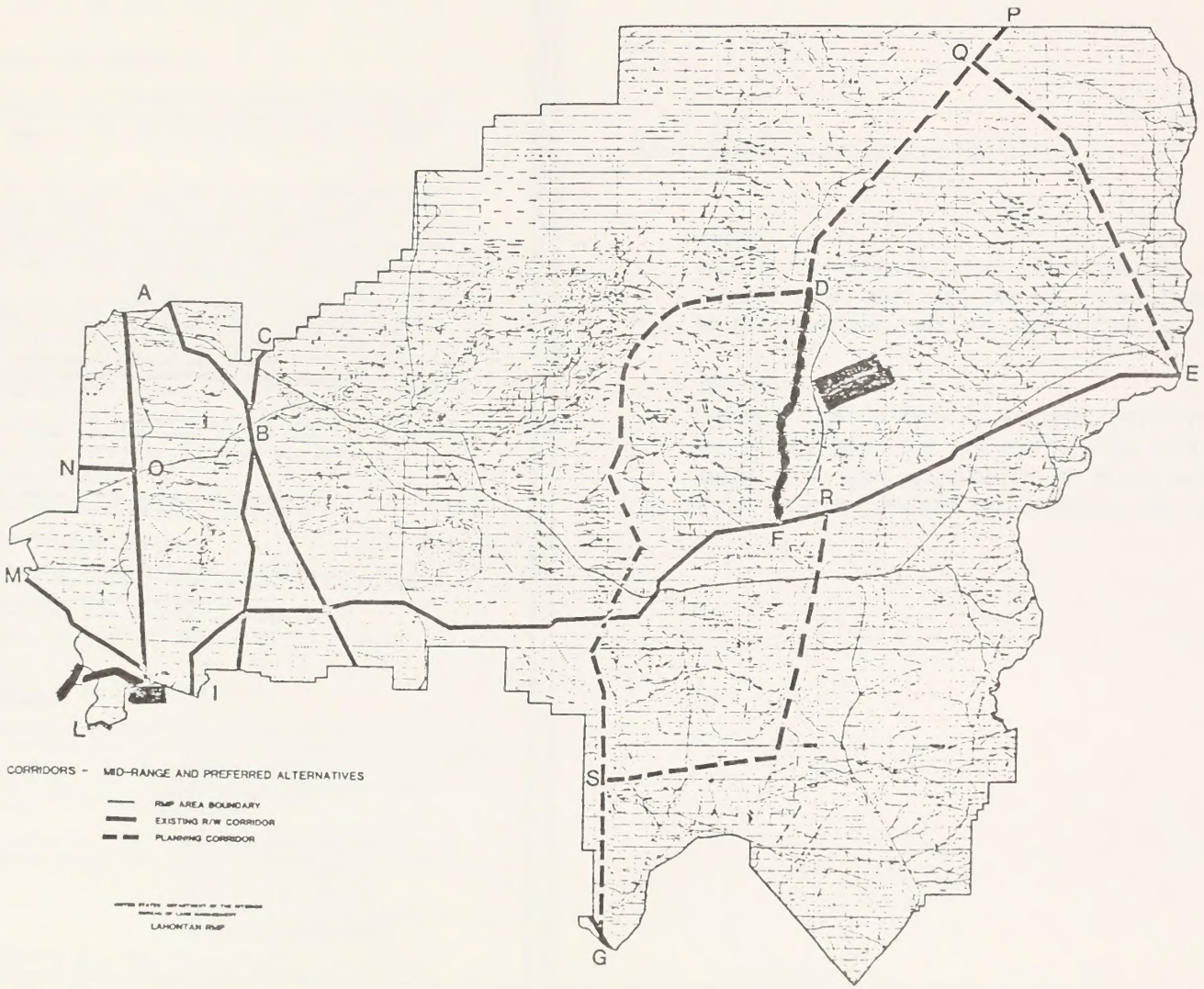
Jack L. Byrom

JLB/SPY/jc
993/5-11

cc: Ed Spang - BLM Director, Nevada
James Phillips - BLM
Jack Seley - BLM

16-14 Nowhere in the supplement is a buffer zone proposed. Such a concept is not provided for in the Wilderness Act or Bureau policy. In conformance with Bureau policy, the supplement has an analysis of the minor impacts of powerlines on solitude only as they relate to opportunities within the WSA boundaries.

ATTACHMENT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CORRIDORS - MID-RANGE AND PREFERRED ALTERNATIVES
RMP AREA BOUNDARY
EXISTING R/W CORRIDOR
PLANNING CORRIDOR
LAHONTAN RMP

Comment Letter 17

563 Penny Way
Sparks, Nevada 89431

September 4, 1984

Mr. Tom Owen
U. S. Bureau of Land Management
1050 East William Street
Carson City, Nevada 89701

Dear Tom:

This letter is in response to the draft supplement of the Lahontan Resource Management Plan & Environmental Impact Statement.

My recommendation on Soda Lake is to take the "No Action Alternative".

My reasons for this recommendation are as follows:

17-1 1. Soda Lake is used very little as a recreational area. As a result it has remained almost unchanged for the past 75 years. Let's leave it that way.

17-2 2. Concern for the buildings and equipment which are under about 50 feet of water seems to be unwarranted. The only people who can reach the buildings and equipment are scuba divers.

The term "Area of Critical Environmental Concern" is a term which is relatively new to me. I think we should discuss this classificiation, its purpose and its use at the next advisory council meeting.

Sincerely,

Bob

R. T. Forest

cc: Harold Duarte

Response Letter 17

17-1 Although some increase in recreation use is expected to result from ACEC designation, it is not expected to increase to a level where the character of the area would be changed. The purpose of the ACEC designation is to protect the area.

17-2 We have received numerous expressions of interest in protection of Soda Lake not only from scuba divers, but also from those concerned about its scientific and historical values.

Comment Letter 18

UNITED STATES GOVERNMENT

Memorandum

FISH AND WILDLIFE SERVICE
GREAT BASIN COMPLEX
4600 Kietzke Lane, Bldg. C
Reno, Nevada 89502

TO : Tom Owen, District Manager, Bureau of Land Management, Carson City, Nevada

DATE: September 20, 1984

FROM : Richard Navarre, Acting Complex Manager, Reno, Nevada

SUBJECT: Lahontan Resource Management Plan Supplement

The Fish and Wildlife Service (Service) has reviewed the supplement to the Draft Resource Management Plan and the Environmental Impact Statement for the Lahontan Resource Area, Nevada. We have concerns with the O-S portion of the P-Q-D-S-G planning corridor.

In May of this year we met with Mr. Lee Grover of your staff to review tentative corridors. At that time and through letters of May 21, and May 23, 1984, concern was expressed that the D-S planning corridor would encroach upon Stillwater Wildlife Management Area. The preferred alternative of the draft supplement now indicates this corrodor passes through wetlands of Alkali #1 Unit within the refuge. 18-1

The primary use now envisioned for this corrodor is a large electric transmission line from the recent geothermal discoveries in Dixie Valley. Accordingly, our objections to this corridor are based largely on the presence of a major transmission line. However, once established such a corridor could include lesser transmission lines, improved roads, and possible pipelines. The following adverse impacts may be expected of the D-S planning corridor:

1. Migratory bird mortality through strikes.
2. Increased human disturbance of wildlife.
3. Diminished aesthetic value to refuge users.
4. Possible increases in vandalism and poaching.
5. Electrocution of raptors and mortality through strikes should smaller transmission lines ultimately be constructed.
6. Degradation or loss of wetlands from road construction and possible pipelines.
7. Conflicts with bighorn sheep in the Stillwater Range.

The proposed planning corridor would directly conflict with the purposes of Stillwater Wildlife Management Area. It is unlikely that the Service would authorize construction across the refuge. The Service requests that the D-S planning corridor be eliminated. We suggest that the existing R/W corridor, D-F, be modified to accommodate the proposed major transmission lines and future needs.

We appreciate the opportunity to review and comment upon the draft supplement. If you have any questions, please contact Bob Hallock at (702) 784-5227 or FTS 470-5227.

Richard Navarre
Acting Complex Manager

Copy to: Nevada Department of Wildlife, Reno and Fallon, Nevada
Stillwater Wildlife Management Area, FWS, Fallon, Nevada
Regional Director (AER), FWS, Portland, Oregon

Response Letter 18

18-1 Please refer to response 14-1.

Sun Geothermal Company
P.O. Box 2885
Dallas, Texas 75221
214 739 9100

SUN

September 18, 1984

District Manager
Carson City District
1050 East William Street, Suite 335
Carson City, Nevada 89701

Dear Sir:

This letter is a response to the Supplement to the Draft Lahontan Resource Management Plan and Environmental Impact Statement. As Sun Geothermal Company ("Sun") holds nine federal leases, as well as five fee leases, in Dixie Valley, an area of major geothermal interest, we are particularly interested in the designation of powerline corridors from that area. The development of our major geothermal resource will require power transmission lines to interconnect the electric generation power plant to a utility's grid. We have a contract to supply power to Southern California Edison.

Sun currently has an application for a 215-mile corridor filed with the BLM in Carson City and Bishop, California. The segment of the corridor, designated P-Q-D-S-G by the BLM, is the only viable route south towards the Southern California Edison substation near Bishop, California. A route south through Dixie Valley and Fairview Valley has been blocked by the Navy withdrawal and current Naval activities.

Sun takes exception to the following statements:

1. Page 4-8

RIGHTS-OF-WAY CORRIDDRS

MID-RANGE ALTERNATIVE

...

Visual Resources

...

The corridor with the highest adverse visual impacts in this proposal is the corridor route over the Stillwater Range. Sixteen miles of this route would have adverse impacts to the Class B scenery of the Stillwater Range.

...

Comment Letter 19

2. Page 4-12

Wilderness

Planning corridors under this alternative would have negative impacts on the Job Peak and Desatoya Mountains WSAs.

Although no transmission line could actually be placed inside the area recommended suitable for wilderness designation in the Job Peak WSA under this alternative, the Dixie Valley corridor would adjoin the northern portion of the area. In addition, should a transmission line be built along this corridor, especially a large line (115 kV or greater), it would be visible from the main ridgeline of the WSA, having a negative impact on a visitor's feelings of solitude.

3. Page 4-14

RIGHTS-OF-WAY CORRIDORS

PREFERRED ALTERNATIVE

...

Wildlife

...

Corridor P-Q-D-S-G follows the existing right-of-way on the northern perimeter of the Job Peak Bighorn Sheep Habitat Area. The proposed corridor with its associated development and maintenance would increase human intrusion into the area, and could cause disturbance of bighorn sheep. This would be a major impact to bighorn sheep populations. This corridor also follows close to or across the boundary of the Stillwater National Wildlife Refuge. Some mortality would be expected to occur for waterfowl that could fly into the lines (USFWS, 1984).

...

4. Page 4-15

Recreation

This alternative strives to maintain the balance between primitive-rural and urban type recreation opportunities currently found in the RMP area. Most proposed corridors follow existing lines or roads, or cut across land already evaluated as being roaded natural or rural in nature, where vehicular recreation predominates. The corridor with the most impact is the Sunoco route over the Stillwater Range. This positively affects motorized recreational opportunities in that area, but could diminish non-motorized types of opportunities.

Comment Letter 19

District Manager
September 19, 1984
Page Three

5. Page 4-17

...

MITIGATING MEASURES

Due to the potential for negative impacts to bighorn sheep and waterfowl that portion of corridor P-Q-D-S-G from Dixie Valley over the Stillwater Range and south to corridor I-F-R-E would only be used if the outlet from Dixie Valley south along corridor Q-D-F is blocked by the proposed expansion of the Navy withdrawal.

Our rebuttals to the above statements are as follows:

1. &
19-1 2. Vehicle traffic and hikers have limited visibility of the existing telephone line that crosses the Stillwaters near the P-Q-D-S-G route. The Sun line should be no exception as the use of wooden poles and "deglared" conductors which compliment (blend) the mountainous background terrain will effectively mitigate the visual impact of the powerline. Unless a visitor is in close proximity to the line or specifically seeks out the line route, the line will not be readily apparent and intrude on a visitor's feeling of solitude.

19-2 3. The sentence "This would be a major impact to bighorn sheep populations." is particularly objectionable. Mitigation measures for the construction access road (about two miles in length) will effectively stop all vehicular traffic into the corridor. Many jeep trails already exist into the area. (See enclosed map.) Careful control during construction should prevent human intrusion outside the corridor. We do not believe a major impact will occur. The powerline at its closest point to the water in this high water year is about one mile away. (See enclosed map.) Therefore, we expect very little, if any, mortality would occur from waterfowl flying into the lines.

19-3 4. After construction is complete, Sun proposes to limit access to the road to maintenance personnel; therefore, we see no detrimental or beneficial recreational benefits occurring.

19-4 5. The Navy withdrawal has blocked any alternative route south through Dixie and Fairfield Valley. Therefore, the mitigation measure should be changed to reflect the Navy's position on powerline corridors.

We realize our statements are late, but hope they will be included in the BLM final resource management plan.

Sincerely,

Shirley Nowicki

SHIRLEY S. NOWICKI
Manager, Marketing

SSN/bv
Attachment

Response Letter 19

19-1 In conformance to the National Environmental Policy Act and Bureau regulations the Supplement analyzes the impact of powerlines in general since corridors are not reserved for the exclusive use of any one company. The impacts of specific right-of-way proposals such as the Sun Geothermal line will be analyzed in subsequent site specific Environmental Assessments. It should be noted that while measures can be taken to reduce the visual impacts of powerlines, such impacts cannot be completely eliminated.

19-2 We agree. Refer to the Revisions, Additions, and Errata section of this document for revision of this statement.

19-3 Refer to response 14-1. Since the corridor may eventually service several rights-of-way, it would be difficult to limit access to the road. In addition, four-wheel ORVs are difficult to control use in these areas.

19-4 The subject mitigation measure has been deleted since the proposed corridor segment has been moved east of the Refuge (refer to Preferred Alternative Corridor Map). Rights-of-way through the corridor will be granted only if and when the Job Peak WSA is dropped from further consideration as wilderness. It should be noted that rights-of-way can be granted outside corridors on a case-by-case basis.

SECTION THREE

COMMENTS AND RESPONSES FROM THE NEVADA STATE GOVERNOR'S CONSISTENCY REVIEW

One comment letter was received from Nevada Governor Richard Bryan. It is reproduced on the following page.

Comment Letter 1

THE STATE OF NEVADA
EXECUTIVE CHAMBER
Carson City, Nevada 89710

RICHARD H. BRYAN
Governor

TELEPHONE
(702) 885-5670

August 6, 1984

Edward F. Spang, Director
Nevada State Office
Bureau of Land Management
P. O. Box 12000
Reno, Nevada 89520-0006

Dear Mr. Spang:

The State has completed its consistency review of the Lahontan Preliminary Final Resource Management Plan and Environmental Impact Statement.

In February the State commented on the wilderness review contained in the Draft Plan and Environmental Impact Statement. At that time, we concurred with your agency's preferred position on two wilderness study areas, Job Peak and the Stillwater Range. However, we asked that the Clan Alpine Wilderness Study Area be dropped from further wilderness consideration and requested that the boundary of the Desatoya Wilderness Study Area be adjusted.

1-1 We have thoroughly reexamined all data on the wilderness study areas. Based on that reexamination, we are at this time dropping our objections to the Clan Alpine Wilderness Study Area. We will concur with your preferred alternative recommending designation of a portion of this wilderness study area. However, the State must take the position that the boundary of the Desatoya Wilderness Study Area should be adjusted to exclude areas of high mineral potential near the historic mining district near Carroll Summit. We will be pleased to work with your staff on drawing a new boundary that considers both the area's manageability and its mineral potential.

Response Letter 1

1-1 We have adjusted the boundary of the Desatoya Mountains Wilderness Study Area (WSA) in the vicinity of Carroll Summit after additional field examination and analysis of information provided by the Nevada Department of Minerals and the Nevada Bureau of Mines and Geology.

Comment Letter 1

We will continue to examine new information on these wilderness study areas as it becomes available. Please do not hesitate to contact us if you need additional information.

Sincerely,

RICHARD H. BRYAN
Governor

RHB/sc

BIBLIOGRAPHY

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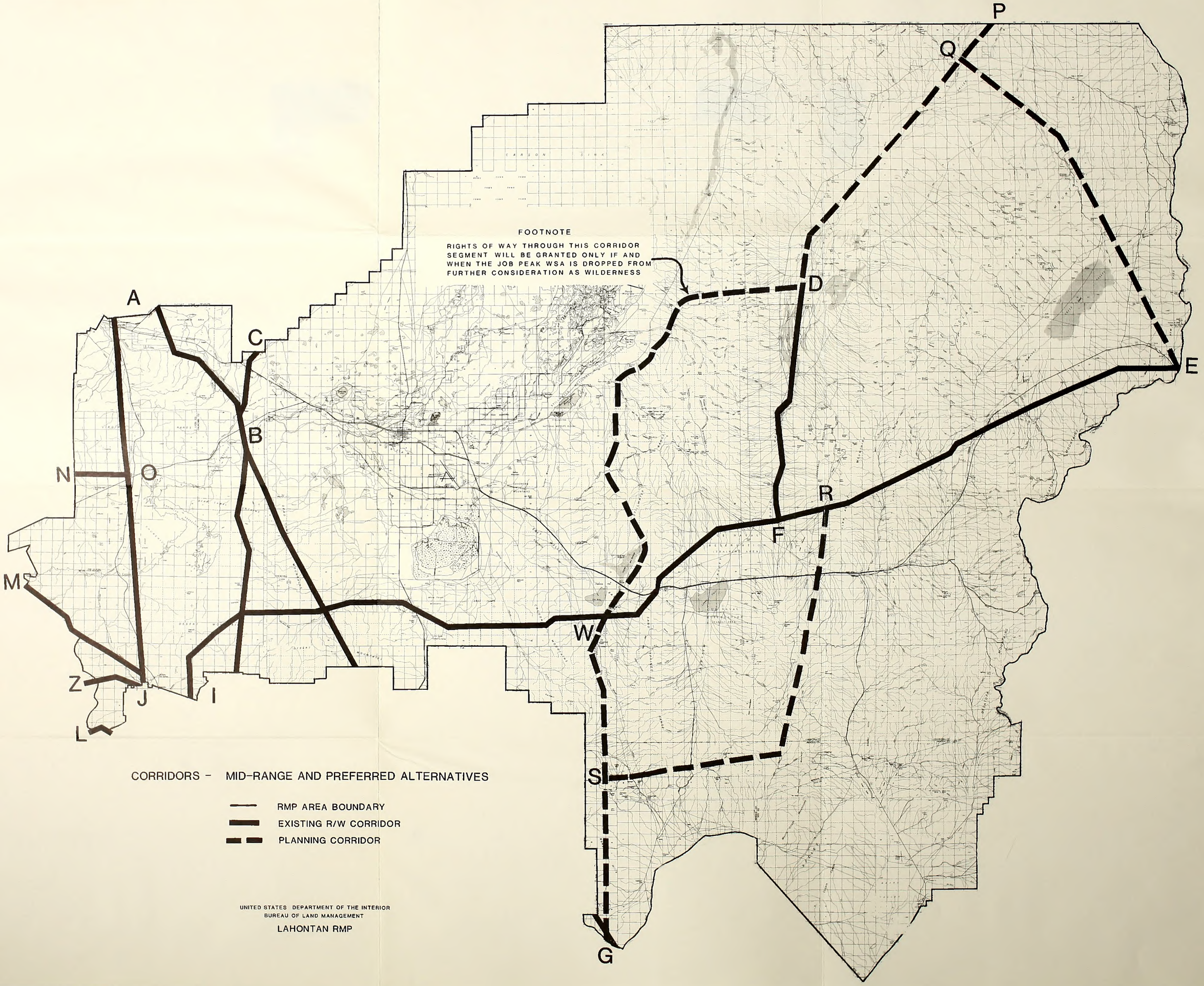
FOOTNOTE
RIGHTS OF WAY THROUGH THIS CORRIDOR SEGMENT WILL BE GRANTED ONLY IF AND WHEN THE JOB PEAK WSA IS DROPPED FROM FURTHER CONSIDERATION AS WILDERNESS
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EXISTING R/W CORRIDOR
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LAHONTAN RMP